

Exhibit H2

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1 A P P E A R A N C E S	1 S T I P U L A T I O N S
2	2 IT IS HEREBY STIPULATED AND AGREED by and
3	3 among the attorneys for the respective parties hereto
4 For the Plaintiff/ Joanna J. Cline	4 that the videotaped deposition of SASHA GONG, may be
5 Counterclaim Defendant: Pepper, Hamilton, LLP	5 taken on behalf of the DEFENDANT/COUNTERCLAIM
6 1313 North Market Street	6 PLAINTIFF, on NOVEMBER 26, 2019, in WASHINGTON, DC,
7 Suite 5100	7 by Jana C. Hazelbaker, Certified Shorthand Reporter
8 Wilmington, DE 19899	8 within and for the State of Oklahoma, pursuant to
9 (302)777-6542	9 Subpoena.
10 clinej@pepperlaw.com	10 IT IS FURTHER STIPULATED AND AGREED by and
11	11 among the attorneys for the respective parties hereto
12 For the Defendant/ Edward D Greim	12 that all objections, except as to the form of the
13 Counterclaim Plaintiff: Graves, Garrett, LLC	13 question, are reserved until the time of trial, at
14 1100 Main Street	14 which time they may be made with the same force and
15 Suite 2700	15 effect as if made at the time of the taking of this
16 Kansas City, MO 64105	16 deposition.
17 (816)256-3181	17 *****
18 edgreim@gravesgarrett.com	18
19	19
20	20
21	21
22	22
23	23
24	24
25	25

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<p>1 Q Very -- very well. And, also, if you don't</p> <p>2 understand one of my questions, I would like you to</p> <p>3 please let me know that.</p> <p>4 Will you do that?</p> <p>5 A Of course I will do that.</p> <p>6 Q Very good.</p> <p>7 A Never answer questions which I don't</p> <p>8 understand.</p> <p>9 Q Okay. Well, with that background, let's --</p> <p>10 let's jump into this.</p> <p>11 Now, Ms. Gong, I understand that you were</p> <p>12 born in China and emigrated to the United States at</p> <p>13 some point; is that right?</p> <p>14 A Yes. I was born in 1956 in China, and I</p> <p>15 came to study in the United States of America in</p> <p>16 1987. Later I got my citizenship, in 2001.</p> <p>17 Q Okay. Could you just tell me about your --</p> <p>18 just generally, about your life in China before you</p> <p>19 came here to study in 1987?</p> <p>20 A That's a couple books. I only wrote one on</p> <p>21 this. Several -- well, I came here -- I was born in</p> <p>22 China in family of intellectuals.</p> <p>23 And in 1965, my family was accused of being</p> <p>24 counterrevolutionary and we were sent to countryside.</p> <p>25 So my education stop, but -- at third grade. And I</p>	<p>1 Q Now, let me -- let me stop you for a second</p> <p>2 here. So you were arrested in 1977, but released in</p> <p>3 1978?</p> <p>4 A Yes.</p> <p>5 Q Okay. And then -- so then what happened</p> <p>6 after you were released?</p> <p>7 A The release -- for a few months I was still</p> <p>8 under government official surveillance, so they have</p> <p>9 two people -- you know, every day I go to work the</p> <p>10 two people would sit next to me and work with me, but</p> <p>11 I have to report, say, "I'm going to the bathroom."</p> <p>12 "You're going to the bathroom."</p> <p>13 And "I'm going home."</p> <p>14 "You're going home."</p> <p>15 Watching when you get home -- and my mother</p> <p>16 actually helped them to report down everywhere you</p> <p>17 went, I got home and stuff like that. That's</p> <p>18 official surveillance.</p> <p>19 Q So how long did that persist?</p> <p>20 A For -- for, like, yeah, another 11 months</p> <p>21 or something until -- until the end -- no, not --</p> <p>22 nine -- nine months, until the end of 2000 -- well,</p> <p>23 no, '7- -- gosh, 1978. The end -- the last day of</p> <p>24 1978.</p> <p>25 That was when Mr. Xi Zhongxun -- last</p>
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<p>1 work in countryside for a few years, and later I was</p> <p>2 assigned to work in a factory, so I was a mechanic</p> <p>3 and a factory worker for seven years.</p> <p>4 In 1974, before my 18th birthday, I got</p> <p>5 involved -- you know, after reading books and reading</p> <p>6 articles, I got involved in the underground protest</p> <p>7 movement, which was a nationally famous case, very</p> <p>8 famous case. And we got persecuted, gradually</p> <p>9 everybody got arrested and put in jail, detention,</p> <p>10 interment, whatever you call it.</p> <p>11 I was detained a couple of times, and then</p> <p>12 later in early 1977, I don't remember the date, I was</p> <p>13 arrested and I stay in jail for 11 months, almost a</p> <p>14 year. I -- a few days short for a year.</p> <p>15 And I was lucky at that time because, you</p> <p>16 know, my -- the allegation was I wrote so much</p> <p>17 criticizing the Communist Party, I participate in</p> <p>18 underground movement. The accusation was we tried to</p> <p>19 overthrow the government, which was not accurate.</p> <p>20 I -- I'm -- I just -- we just criticize them.</p> <p>21 So what happened is that Mao died in '76</p> <p>22 and the things change dramatically in late '77. I</p> <p>23 was released in 1978, but still put under</p> <p>24 surveillance and -- to go back to work in the</p> <p>25 factory.</p>	<p>1 name Xi, X-i, first name Z-h-o-n-g-x-u-n -- he was</p> <p>2 in -- in China, he was persecuted by Mao, a Chinese</p> <p>3 official -- sorry about that -- and he was -- he was</p> <p>4 jailed for 16 years.</p> <p>5 At that time, he was assigned to work as</p> <p>6 the number one, the party's secretary in my province,</p> <p>7 Guangdong Province. Guangdong spelled like</p> <p>8 G-u-a-n-g-d-o-n-g. So he released my entire group.</p> <p>9 By the way, it's very important to notice</p> <p>10 that Mr. Xi Zhongxun was the father of</p> <p>11 Mr. Xi Jinping, who is China's president now.</p> <p>12 Q Okay. Okay. Well, tell me, at -- so</p> <p>13 after -- after your probation ended, what happened</p> <p>14 next?</p> <p>15 A I -- I was given back the full right of</p> <p>16 the -- of a Chinese citizen. So Mr. Xi actually</p> <p>17 asked me, "What do you want to do?"</p> <p>18 I said, "My intention is to go to college."</p> <p>19 And college were closed by Mao for 12 years. It was</p> <p>20 re-opened and -- in 1978. And 1970- -- so everybody,</p> <p>21 you know, grad- -- high school graduate for 12 years</p> <p>22 jumping to taking the college exam.</p> <p>23 And I took the college exam in 1979, the</p> <p>24 first time, and I was very lucky, even only with</p> <p>25 three years of education before. I got the first</p>

3 (Pages 9 to 12)

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<p>1 among my province, 200,000 people. I was told I was</p> <p>2 ranked among top ten -- I mean, ten people in China.</p> <p>3 That top ten people don't mean ten/ten because a lot</p> <p>4 of people got the same scores, but it was a great</p> <p>5 honor. And then I went to Peking University, the</p> <p>6 best one in China. That one -- I was very happy.</p> <p>7 Q Okay. When did you graduate from Peking</p> <p>8 University?</p> <p>9 A I graduated from Peking University in 1983,</p> <p>10 and then I went to the graduate program. I</p> <p>11 studied -- I studied 20 -- I studied British Empire</p> <p>12 and the British Empire Triangle Trade and the history</p> <p>13 of British Empire and wrote a lot of articles on</p> <p>14 that.</p> <p>15 So I graduated in 1986 from Peking</p> <p>16 University with a master's degree, and I -- at that</p> <p>17 time, for very -- Americans with -- looks like very a</p> <p>18 very silly reason why you would go abroad, because we</p> <p>19 have a severe housing shortage.</p> <p>20 My husband and I got married for three</p> <p>21 years and we have no place to go, no place to live.</p> <p>22 So we said how about try America?</p> <p>23 So we go -- we both applied to American</p> <p>24 schools. He was re- -- he was accepted by Harvard in</p> <p>25 1986. I was accepted by Harvard in 1988. Both of us</p>	<p>1 A Oh, yes.</p> <p>2 Q Okay.</p> <p>3 A Very much. And I think the entire Chinese</p> <p>4 dissident movement can testify for me. In fact,</p> <p>5 before I went to Peking U, my group, who was just</p> <p>6 exonerated, made the connection with the major</p> <p>7 dissident group in Beijing.</p> <p>8 And the head of that one has died. One is</p> <p>9 in New York. I just int- -- gave him a long</p> <p>10 interview. Anyway, he was the first person -- that</p> <p>11 protest underground group was the first person I met</p> <p>12 in Beijing. I jump in immediately.</p> <p>13 Everybody in Beijing at times who has spent</p> <p>14 time in jail, who was under -- who was in underground</p> <p>15 movement, everybody knows me. I was extremely</p> <p>16 active.</p> <p>17 Q Okay. Let me ask you, after you came to</p> <p>18 the United States, I think you testified you came in</p> <p>19 19 --</p> <p>20 A '87.</p> <p>21 Q -- '87. Okay. After you came to the</p> <p>22 United States, did you sever your ties with the</p> <p>23 protest movement in China?</p> <p>24 A No. No. I -- I have been there for 45</p> <p>25 years. I'm -- you know, I'm one -- I'm one of the --</p>
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<p>1 were accepted in Ph.D. programs, but I came to</p> <p>2 Harvard as a -- as a visiting scholar the year</p> <p>3 before.</p> <p>4 Q All right. Let me -- let's continue with</p> <p>5 the questioning. So let me -- let me ask you, during</p> <p>6 the time that you were in university and the graduate</p> <p>7 program, were you performing any kind of function or</p> <p>8 role for the government in China?</p> <p>9 A The Chinese government?</p> <p>10 Q Right.</p> <p>11 A No.</p> <p>12 Q Okay.</p> <p>13 A Not only that, I'm a very rare one because</p> <p>14 usually, you know, in China when you reach nine years</p> <p>15 old you become a Young Pioneer, and then later it --</p> <p>16 into the young -- Young Communist Youth Lead and</p> <p>17 something in Communist Party.</p> <p>18 I was never in because when I was nine, my</p> <p>19 family was kicked out. So, luckily, I was always the</p> <p>20 target of the government, never part of the</p> <p>21 government.</p> <p>22 Q Okay. Well, let me ask you the other</p> <p>23 question then. During your time at Peking University</p> <p>24 and in graduate school, did you -- were you part of</p> <p>25 any sort of protest movement?</p>	<p>1 the most senior, in a way, dissident in China because</p> <p>2 this year is my 45th year in the dissident movement.</p> <p>3 And I wrote articles, and I even ask all</p> <p>4 the Tiananmen leader, and ask why so many people --</p> <p>5 after they left the state, they ended up in Boston.</p> <p>6 That was because of me.</p> <p>7 I helped everybody and I, you know, helped</p> <p>8 them full-heartedly, long record, never interrupted</p> <p>9 by anything.</p> <p>10 Q Is there such a thing as a Chinese</p> <p>11 dissident movement in the United States?</p> <p>12 A Yes.</p> <p>13 MS. CLINE: Objection to form.</p> <p>14 THE WITNESS: Oh, sorry. You -- your</p> <p>15 objection?</p> <p>16 There is a movement.</p> <p>17 MS. CLINE: I'm just objecting to the form</p> <p>18 of his question. You can go ahead and answer it.</p> <p>19 Q (By Mr. Greim) You -- you can go ahead.</p> <p>20 You can complete your answer.</p> <p>21 A Yes, of course, I am part of it, and their</p> <p>22 organizations. You know, these people may have,</p> <p>23 well, difficulties in learning English or making a</p> <p>24 living. I considered myself very lucky, but we never</p> <p>25 stopped fighting dictatorship.</p>

4 (Pages 13 to 16)

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<p>1 We think it's our duty. That's my life and</p> <p>2 that -- that will be my life in the future, to fight</p> <p>3 dictatorship. That's what I have done. That's what</p> <p>4 I paid the price for. And that's what I will do.</p> <p>5 Q Okay. And, of course, you're in the U.S.</p> <p>6 and not in China, so I guess my question is, how --</p> <p>7 when you say you're "fighting dictatorship," what</p> <p>8 concrete activities are you doing in the U.S. to</p> <p>9 fight a dictatorship?</p> <p>10 A By training, I'm a writer. I write and I</p> <p>11 disseminate information back to China. Whenever it</p> <p>12 is possible, I would publish in Chinese media.</p> <p>13 Whenever -- I publish several books there.</p> <p>14 And, of course, the Chinese government</p> <p>15 would not allow me to say anything about -- to</p> <p>16 criticize them. So I wrote a lot -- plenty about</p> <p>17 America democracy, about how we -- how our people</p> <p>18 work in democracy.</p> <p>19 Like, if you want example, 2009, I</p> <p>20 participated in the election -- well, a local</p> <p>21 election. I ran for the Virginia House of Delegates.</p> <p>22 And so I spent a year running for that and writing</p> <p>23 this book.</p> <p>24 The book entitled "Living Democracy," it's</p> <p>25 a bestseller in China. And the Chinese use that</p>	<p>1 I was using a cookbook form. It's called a cultural</p> <p>2 revolution cookbook. I was using the cookbook form</p> <p>3 to tell people the -- the persecution, the stories</p> <p>4 of -- the ridiculous of the revolution, the Mao</p> <p>5 revolution.</p> <p>6 Q Now, Ms. Gong, here's what we're going to</p> <p>7 do. Thank -- thank you very much for your testimony</p> <p>8 here, but we're going to try to make sure we have</p> <p>9 more of a question/answer for me. Okay?</p> <p>10 So I -- we're laying some background right</p> <p>11 now, but I'm going to try to be -- I want you to try</p> <p>12 to focus and answer just the question that I ask as</p> <p>13 we get into some more specific questions. Okay?</p> <p>14 A Okay.</p> <p>15 Q And then that way, it'll give opposing</p> <p>16 counsel a chance to object to it and -- and it'll</p> <p>17 just make the record clearer. Okay?</p> <p>18 A All right.</p> <p>19 Q Okay. Very good. So, now, after you --</p> <p>20 I -- I take it you got a degree from Harvard, right?</p> <p>21 A Yes. I got a Ph.D. in sociology in 2000 --</p> <p>22 no, sorry, 1995. But I don't prefer to be called</p> <p>23 "Doctor" because it sounds ridiculous.</p> <p>24 Q Okay. Well, what did you do after you got</p> <p>25 your -- your doctorate?</p>
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<p>1 as -- a lot of Chinese, small groups and the</p> <p>2 students, they use that as a textbook of how to build</p> <p>3 their future democracy.</p> <p>4 Q Okay. Now, you've mentioned books a couple</p> <p>5 of times. So you -- I take it you've written at</p> <p>6 least a few books?</p> <p>7 A Lots.</p> <p>8 Q Okay. Well, how -- how many books have</p> <p>9 you -- have you written?</p> <p>10 A I think -- well, in Chinese, I -- I think</p> <p>11 altogether 11, but I -- well, unfortunately, the</p> <p>12 English books are here, the Chinese books only</p> <p>13 publish three. And the manuscript, even including</p> <p>14 one about 2016 election, it's in printing and the</p> <p>15 Chinese government ban it. So they ban most of my</p> <p>16 books.</p> <p>17 Q Okay. Is it possible for someone here</p> <p>18 to -- to buy one of your books?</p> <p>19 A Oh, yes. You can go online and can buy my</p> <p>20 books. And also my books in English, one is called</p> <p>21 "Born American." As I said, it's about my life in</p> <p>22 China. And, also, I wrote a cookbook.</p> <p>23 Q Okay.</p> <p>24 A And you'd love that cookbook because it's a</p> <p>25 cookbook with stories of the culture of revolution.</p>	<p>1 A I ex- -- went to teach at UCLA for a couple</p> <p>2 of years, and then I left the job and came to get a</p> <p>3 job at Radio Free Asia to direct the Cantonese</p> <p>4 service because I think I -- my personality is more</p> <p>5 media person.</p> <p>6 And after that, I went to work for AFL-CIO</p> <p>7 as their China hand, and that also as a former labor</p> <p>8 activist then. Yeah, I learned a lot.</p> <p>9 And after that, in 2011, I took a job at</p> <p>10 Voice of America as the director of the Chinese</p> <p>11 branch.</p> <p>12 Q What were your duties as director of the</p> <p>13 Chinese branch at Voice of America?</p> <p>14 A I -- I have to take the job. It's like</p> <p>15 a -- the mother of the branch, 100 people, and I --</p> <p>16 I -- I was the first Chinese/Asian and woman</p> <p>17 direct- -- before -- before and after me, everybody</p> <p>18 was -- or is a white man.</p> <p>19 So my role was very different. I took care</p> <p>20 of the -- the -- well, and I focused on expanding our</p> <p>21 audience and telling them more about our democracy</p> <p>22 and the -- the -- more truth.</p> <p>23 So, proudly, three years of the director</p> <p>24 survey shows I increased the audience by 22 times.</p> <p>25 Q Now, could you tell us, what is the</p>

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<p>1 Voice of America?</p> <p>2 A Voice of America is established by the</p> <p>3 United States of America in 1942 with foreign</p> <p>4 language broadcasting to tell the world about America</p> <p>5 values and America to -- to tell the truth. So truth</p> <p>6 teller is our goal.</p> <p>7 And for -- compared to commercial</p> <p>8 industries, we don't have that sort of a financial</p> <p>9 pressure, so we can focus more on doing our</p> <p>10 programming.</p> <p>11 Q It's taxpayer-funded; is that right?</p> <p>12 A It's taxpayer-funded, Congress-funded.</p> <p>13 Q Okay. Okay. Now, are you still with</p> <p>14 Voice of America?</p> <p>15 A No. They fired me.</p> <p>16 Q And when was that?</p> <p>17 A November 2018.</p> <p>18 Q Okay. And why did they fire you?</p> <p>19 MS. CLINE: Objection; foundation.</p> <p>20 THE WITNESS: Can I answer the question?</p> <p>21 Q (By Mr. Greim) You may.</p> <p>22 A Yes. According to them, I disobey an order</p> <p>23 of -- to -- to stop Mr. Guo Wengui. Last name Guo,</p> <p>24 G-u-o. First name Wengui, W-e-n-g-u-i. I hope I</p> <p>25 spelled it right.</p>	<p>1 (phonetic), China.</p> <p>2 And I understand Mr. Stephen Bannon was</p> <p>3 also very important founding member of the whole</p> <p>4 venture. And I agreed to be a member.</p> <p>5 Q So are you still a member of that entity?</p> <p>6 A Yes, I am still member of that entity.</p> <p>7 Q Okay. Have you been an officer or a</p> <p>8 director of any other U.S. entity that is concerned</p> <p>9 with China?</p> <p>10 A Concerned with -- officer and director?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 Q (By Mr. Greim) Officer or director.</p> <p>13 A Oh, yeah. Yes, I worked for two months as</p> <p>14 director of the Rule of Law Society. That was</p> <p>15 Jul- -- between July and September when I resign.</p> <p>16 Q July and September of this year?</p> <p>17 A September this year, I resign.</p> <p>18 Q And what -- what is the Rule of Law</p> <p>19 Society?</p> <p>20 A Rule of Law Society was announced last --</p> <p>21 November 20 in the press -- in the joint con- --</p> <p>22 press conference of Mr. Steve Bannon and</p> <p>23 Mr. Guo Wengui.</p> <p>24 In the press conference -- I was the -- in</p> <p>25 the press conference, they both announce that Mr. Guo</p>
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<p>1 We -- actually, we -- well, I was the</p> <p>2 online anchor and the interviewer of that -- that</p> <p>3 program. That program broadcasted 19 minutes longer</p> <p>4 than the scheduled -- the scheduled one hour, and I</p> <p>5 never receive any order before to stop it, so it</p> <p>6 broadcasted a little longer, caused lots of, you</p> <p>7 know, publicity, and so they blamed me for that.</p> <p>8 They asked -- they asked me to lie. I</p> <p>9 refused to. They asked me to say it's a technical</p> <p>10 something problem.</p> <p>11 I said, if I -- if I -- if I speak, it will</p> <p>12 be all -- be the truth. So I think I pay a price for</p> <p>13 telling the truth.</p> <p>14 Q Let me -- let -- let's turn to someone --</p> <p>15 oh, I'm sorry, before we do -- we'll come back to</p> <p>16 this. I'm going to make sure we finish some of your</p> <p>17 background here.</p> <p>18 Since you have been in the U.S., have you</p> <p>19 been asked to become a member of any organization</p> <p>20 that is concerned with China?</p> <p>21 A Yes. Actually, I think earlier this year</p> <p>22 that Frank Gaffney, who's the head of the Center for</p> <p>23 Security policy, also a radio show host, he</p> <p>24 interviewed me and he asked me to be a founding</p> <p>25 member of the committee for -- for President Benger</p>	<p>1 Wengui will donate \$100 million to set up an entity</p> <p>2 called Rule of Law Foundation to promote Rule of Law</p> <p>3 in China.</p> <p>4 And later that organization was split --</p> <p>5 split into two branch. One is Rule of Law</p> <p>6 Foundation, a 501(c)(3). The other one is the Rule</p> <p>7 of Law Society, a 501(c)(4).</p> <p>8 I am a board member of the 501(c)(4),</p> <p>9 chaired by Mr. Stephen Cannon -- Bannon. Sorry.</p> <p>10 Yeah, he -- he sounds like a "Cannon" sometimes.</p> <p>11 Q That's okay. Now, wait a sec. You just</p> <p>12 said you are a board member. Are you?</p> <p>13 A No, I were -- I was. I was a board member.</p> <p>14 Q You were.</p> <p>15 A I am no longer board member now.</p> <p>16 Q Okay.</p> <p>17 A But the strange thing is that a few days</p> <p>18 ago, why the Board -- the -- for this, I -- I just</p> <p>19 want to put that on the record. Why would Jennifer</p> <p>20 Mercur -- Mercurio -- I -- I'm asking the opposing</p> <p>21 counsel. Why would she call me?</p> <p>22 MR. GREIM: Okay. Hold -- hold on. I'm</p> <p>23 just going to instruct the witness. The witness</p> <p>24 cannot inquire of the two lawyers who are here.</p> <p>25 THE WITNESS: Sorry.</p>

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<p>1 Q And -- okay. Have you received any e-mails</p> <p>2 from Jennifer?</p> <p>3 A Nothing. No. No e-mail, nothing.</p> <p>4 Q Any texts?</p> <p>5 A Texts or phone calls, no, nothing. That's</p> <p>6 the only communication I received regarding my</p> <p>7 testimony.</p> <p>8 Q Okay.</p> <p>9 A Besides your subpoena.</p> <p>10 Q Did she offer to provide you an attorney?</p> <p>11 A I told her I don't need -- she did not</p> <p>12 offer, but I told her I don't need an attorney</p> <p>13 because I have very little idea of what the hell is</p> <p>14 this case.</p> <p>15 Q All right. Okay. Let's -- let's switch</p> <p>16 gears here and let me -- let's go back. You were</p> <p>17 testifying a moment ago about an interview with Guo</p> <p>18 Wengui and with Voice of America.</p> <p>19 A I see.</p> <p>20 Q Okay. So let's talk about that for a</p> <p>21 second. Could you tell us how you first met Mr. Guo?</p> <p>22 A I met Mr. Guo on April 17, 1970- --</p> <p>23 April -- April 17, 19 -- no, sorry, 2017, in the</p> <p>24 evening around 7:15.</p> <p>25 First, actually, when Mr. Guo went out</p>	<p>1 direct my reporters to cover it a little bit because</p> <p>2 these are big cases, especially when it involve in</p> <p>3 the -- the head of Chinese espionage, Mr. Ma Jian,</p> <p>4 who was in charge of international espionage in</p> <p>5 China, and who's closely -- who works closely with</p> <p>6 Mr. Guo. That's a newsworthy story, so I direct my</p> <p>7 reporters to cover the story.</p> <p>8 Q Okay. And this was back -- was this in</p> <p>9 2015?</p> <p>10 A 2016.</p> <p>11 Q 2016.</p> <p>12 A 2016, we started to cover his story. But,</p> <p>13 personally, my -- I did not pay any attention to him.</p> <p>14 But in February 2017, one of my senior</p> <p>15 correspondents, Fred Wang -- Fred, F-r-e-d, Wang,</p> <p>16 W-a-n-g, last name -- Fred, who -- who was our</p> <p>17 Beijing correspondent for many years, and who came</p> <p>18 back to the states and is still focusing on the China</p> <p>19 report, he contacted Mr. Guo and -- asking for an</p> <p>20 interview.</p> <p>21 Q So let me stop you for a second. Mr. Wang</p> <p>22 connected Mr. Guo and asked him for an interview?</p> <p>23 A I believe so.</p> <p>24 Q Okay. And was that at your direction or</p> <p>25 was he acting on his own initiative?</p>
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<p>1 to -- for his expose', he attract some attention, but</p> <p>2 not much.</p> <p>3 Q Wait. Let -- let me stop you for a second.</p> <p>4 What do you mean, "when he went out for his expose"?</p> <p>5 A Well, I have to go a little bit even back</p> <p>6 on that because in 19 -- 2015 and 2016, there were</p> <p>7 lot of reports coming out of Chinese media, overseas</p> <p>8 Chinese media, inside Chinese media, orders -- the</p> <p>9 report indicated that Mr. Guo, who was working</p> <p>10 closely with very, very high-ranking espionage,</p> <p>11 Chinese intelligence officers to -- well, to earn</p> <p>12 money, high-ranking corruption office, the -- perhaps</p> <p>13 the highest-ranking corruption off- -- cases in China</p> <p>14 since -- since very early on, since early 2000.</p> <p>15 So we are talking about 15 years of -- you</p> <p>16 know, reporting of 15 years of Mr. Guo's personal</p> <p>17 involvement, and paying off the high-ranking</p> <p>18 officials, and cheating people, and -- and sort of --</p> <p>19 in the reports. And the --</p> <p>20 Q Now, wait. Stop -- stop there for a</p> <p>21 second.</p> <p>22 A Yeah.</p> <p>23 Q Are you saying that these are reports that</p> <p>24 you read in the Chinese media in 2015 and 2016?</p> <p>25 A Yes. And, also, I ask my reporters --</p>	<p>1 A He was acting on his own because he has --</p> <p>2 he has that power.</p> <p>3 Q Okay. Very good. So what -- what</p> <p>4 happened?</p> <p>5 A And Mr. Guo and Mr. Wang connected, and</p> <p>6 Mr. Guo asked for an interview.</p> <p>7 And Mr. Guo said, "I want a live interview,</p> <p>8 not a pre-recorded interview."</p> <p>9 The reason we said yes to that is we have a</p> <p>10 show called "Pro and Con" every day at 9:00, which is</p> <p>11 prime time in China. We always have live show.</p> <p>12 Q I'm sorry, is that 9 a.m. or 9 p.m.?</p> <p>13 A 9 p.m. in China. 9 a.m. in the states.</p> <p>14 Q Okay.</p> <p>15 A So we always -- that's always a live show.</p> <p>16 Q Okay.</p> <p>17 A Always. Unless, you know, you have some --</p> <p>18 but always a live show.</p> <p>19 So we said, yes, we invite you -- you as a</p> <p>20 guest. It's all normal.</p> <p>21 And then Mr. Guo later have two other</p> <p>22 conditions. One is that he want me to interview him,</p> <p>23 nobody else.</p> <p>24 Second is that he want -- he want the live</p> <p>25 interview to be three hours instead of one.</p>

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<p>1 Q Okay. And so how did he communicate those</p> <p>2 conditions?</p> <p>3 A With Mr. Wang, Fred Wang. I was not</p> <p>4 involved.</p> <p>5 Q Okay. So is it fair to say that at the</p> <p>6 time Mr. Guo communicated his conditions, you had not</p> <p>7 yet had direct contact with Mr. Guo?</p> <p>8 A That's true.</p> <p>9 Q Okay. Then -- so Mr. Wang then</p> <p>10 communicated Mr. Guo's request to you; is that right?</p> <p>11 A Yes.</p> <p>12 Q And what -- and, I'm sorry, go ahead.</p> <p>13 A It is very unusual because I was the head</p> <p>14 of the service and I was not -- unless it's the</p> <p>15 president or somebody like that, I would not go ahead</p> <p>16 do the interview myself, right?</p> <p>17 But one thing that I do know, I have a good</p> <p>18 reputation as a very straightforward and very hard --</p> <p>19 very hard questioner. I question -- I do -- you can</p> <p>20 see my other interviews.</p> <p>21 So I thought that was a reasonable request</p> <p>22 if someone that's that high-ranking in the espionage</p> <p>23 field. But for three hours.</p> <p>24 So I consulted with my social media</p> <p>25 assistant. At that time, we started social media</p>	<p>1 MS. CLINE: So if we could just move it</p> <p>2 along and get to something relevant, that would be --</p> <p>3 MR. GREIM: To -- to the contrary, this</p> <p>4 background is all necessary.</p> <p>5 Q (By Mr. Greim) So, Ms. Gong, my question</p> <p>6 is -- well, let -- let -- let's -- let's skip ahead.</p> <p>7 When did you, yourself -- well, I -- okay.</p> <p>8 I'll strike that as well.</p> <p>9 You've testified you first met Mr. Guo on</p> <p>10 April the 17th, 2017, at 7:15 p.m. Was that for the</p> <p>11 live interview or was that a discussion in advance of</p> <p>12 the interview?</p> <p>13 A Yeah, that was part of my condition. If I</p> <p>14 live interview him, I have to meet with him and do</p> <p>15 extensive sit-down pre-interview, which is off the</p> <p>16 record first.</p> <p>17 So the first time I met him was the 17th,</p> <p>18 and we questioned him for three hours. And the</p> <p>19 second time was the next day for a whole day.</p> <p>20 Q Okay. And none of that was recorded; is</p> <p>21 that right?</p> <p>22 A No. That's the condition. That's --</p> <p>23 that's also off the record.</p> <p>24 Q Okay. Where was that? Where were those</p> <p>25 meetings?</p>
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<p>1 live streaming. So we put a lot of things live</p> <p>2 stream there, but we don't have enough TV time for</p> <p>3 the three hours.</p> <p>4 So I said, in that case, we have one hour</p> <p>5 of very formal interview on TV. We have another two</p> <p>6 hours not very formal question, and audience can</p> <p>7 raise their questions by social media.</p> <p>8 And for those two hours, I will give him</p> <p>9 some leeway to discuss some cases because in -- in a</p> <p>10 way, the formal interview -- if you guys read the</p> <p>11 interview, I -- I did not give him a lot of leeway to</p> <p>12 talk about things I cannot verify. I only ask him</p> <p>13 questions and talk about things I can verify.</p> <p>14 Q Okay. Let's stop there for a second.</p> <p>15 A Uh-huh.</p> <p>16 Q So I take it, then, that Voice of America</p> <p>17 approved his request that you do the interview and</p> <p>18 that it be live?</p> <p>19 MS. CLINE: I'm just going to lodge an</p> <p>20 objection. I understand the need to do a little bit</p> <p>21 of background, but we've been going for almost an</p> <p>22 hour and there hasn't been a single question that has</p> <p>23 any relevance to the contract at issue in this</p> <p>24 litigation.</p> <p>25 MR. GREIM: All right.</p>	<p>1 A In Guo's apartment.</p> <p>2 Q Oh, in New York?</p> <p>3 A In New York.</p> <p>4 Q Who else was present for those meetings?</p> <p>5 A Fred. Fred Wang. And later, next day, I</p> <p>6 brought my team, my team of six people. Next day we</p> <p>7 have five people there to set up. So it's -- present</p> <p>8 in the interview, mainly me and Fred.</p> <p>9 Q Did Mr. Guo have anyone with him?</p> <p>10 A Mr. Guo introduced me to his assistant,</p> <p>11 Mr. -- Ms. Yvette Wang. And that -- that's --</p> <p>12 whatever you need, talk to my assistant.</p> <p>13 And, also, Mr. Guo introduced us to his</p> <p>14 cook, Mr. Han -- Mr. Han. (Inaudible) Han, Little</p> <p>15 Han. He called him "Little Han." And later I</p> <p>16 learned his name is Han Truong Quang (phonetic).</p> <p>17 And Mr. Guo -- because Fred -- my -- Fred,</p> <p>18 who had some stomach prob- -- he's a stomach cancer</p> <p>19 survivor, so he need the little bit noodle soup in</p> <p>20 the middle, so Mr. Guo called Chef Han to cook, so</p> <p>21 Han cooked for Mr. Wang for -- a little bowl of</p> <p>22 noodle show -- soup.</p> <p>23 Q I'm sorry. Mr. Han Shune Guang (phonetic)</p> <p>24 cooked a bowl of noodles for -- for your reporter</p> <p>25 Fred?</p>

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<p>1 MS. CLINE: Objection; relevance. What</p> <p>2 could the noodles possibly have to do with this case?</p> <p>3 MR. GREIM: You can answer the question.</p> <p>4 THE WITNESS: Yes.</p> <p>5 Q (By Mr. Greim) Did Mr. Guo tell you the</p> <p>6 reason that he wanted you to interview him?</p> <p>7 A He did. He thought I would be the one who,</p> <p>8 you know, do a proper job because he did not know</p> <p>9 other VOA reporters.</p> <p>10 Q Did he tell you that he knew anything about</p> <p>11 you before the interview?</p> <p>12 A He said several times -- I can't pinpoint</p> <p>13 when he said what, but he said several times that he</p> <p>14 read my file in China. I assume that's the -- that's</p> <p>15 my -- I have a thick file in the state security.</p> <p>16 MS. CLINE: Objection; foundation.</p> <p>17 THE WITNESS: Yes, I give you the</p> <p>18 foundation because I know that.</p> <p>19 Q (By Mr. Greim) All right. Hold on. Hold</p> <p>20 on. Let's not -- let's -- let's not do this.</p> <p>21 Let me ask you, why -- why do you say you</p> <p>22 assume that you have a thick file with state</p> <p>23 security?</p> <p>24 A Every former political prisoner has one.</p> <p>25 And, also, when I went to Peking University, my -- my</p>	<p>1 Q Okay. Very well. Well, I -- I would just</p> <p>2 ask -- and we may revisit this issue, but if there is</p> <p>3 a time when you will not answer a question of mine</p> <p>4 due to your reporter's privilege claim, I would just</p> <p>5 simply ask that you make that clear that that is the</p> <p>6 reason --</p> <p>7 A Yes.</p> <p>8 Q -- you're not answering the question.</p> <p>9 A I'm making it very clear. I will not</p> <p>10 answer any- -- tell anything he told me during that</p> <p>11 pre-interview.</p> <p>12 Q Okay. So I understand that this broadcast</p> <p>13 was cut short; is that right?</p> <p>14 A Yes.</p> <p>15 Q And what -- what happened after the</p> <p>16 broadcast?</p> <p>17 A It's not what happened after is important,</p> <p>18 what happened before is very important. And on</p> <p>19 April 18th, the Chinese government actually did a few</p> <p>20 things first.</p> <p>21 The Chinese embassy called Voice of America</p> <p>22 dozens of times, dozens, requesting us to cancel the</p> <p>23 interview.</p> <p>24 And my editor contact me and said, "Well,</p> <p>25 the Chinese said if you -- if you do that interview,</p>
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<p>1 professor joke, my -- actually (inaudible), he said,</p> <p>2 "Your file is as thick as everybody else combined,</p> <p>3 the whole -- whole class." My class would have 28</p> <p>4 people. So if my file is as thick as everybody</p> <p>5 combined, I assume I have a thick file.</p> <p>6 Q Did Mr. Guo explain how he would have had</p> <p>7 access to your file while he was in China?</p> <p>8 MS. CLINE: Objection to form; foundation.</p> <p>9 THE WITNESS: I was not very sure if I</p> <p>10 asked that questions in -- in the -- in the</p> <p>11 pre-interview, so I -- better not to answer that.</p> <p>12 Q (By Mr. Greim) I'm sorry?</p> <p>13 A It -- he is very simple. I will not, you</p> <p>14 know, disclose anything in the pre-interview.</p> <p>15 That's -- but later we have conversation and Guo</p> <p>16 actually said in public that he read my files. He</p> <p>17 said in his broadcasting.</p> <p>18 Who else would have my file?</p> <p>19 Q So are you refusing to answer my question</p> <p>20 on -- as -- as a reporter -- because you spoke with</p> <p>21 him as a reporter?</p> <p>22 A I function only as a reporter in the</p> <p>23 pre-interview. That was about 16 hours. And that</p> <p>24 was a promise. A promise is a promise.</p> <p>25 But later I wasn't function as a reporter.</p>	<p>1 you will permanently destroy the relationship between</p> <p>2 Voice of America and Chinese government."</p> <p>3 I said, "You tell them Voice of America and</p> <p>4 Chinese government has no relationship because we are</p> <p>5 media."</p> <p>6 And then later they also -- well, my</p> <p>7 boss -- my boss did not think that way. They thought</p> <p>8 they did have a relationship. So, of course -- so</p> <p>9 Voice of America's leadership determined to cancel</p> <p>10 the interview, but I think I have the editorial. But</p> <p>11 they determined they want me to cancel the interview.</p> <p>12 I said, "No."</p> <p>13 But they did not send out any -- any</p> <p>14 request. It's on the record, you know, they could</p> <p>15 not find any record to say they canceled interview.</p> <p>16 Q Okay. All right. Let's --</p> <p>17 A But, anyway, so the Chinese later also send</p> <p>18 out written notice against Guo. Interpol.</p> <p>19 Q So after this interview happened, did</p> <p>20 you -- did you do any other interviews with him?</p> <p>21 A On air, yes.</p> <p>22 Q Okay.</p> <p>23 A But that's in the one-year anniversary.</p> <p>24 Q Okay.</p> <p>25 A And it's on air, so that's not</p>

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<p>1 confidential.</p> <p>2 Q When was the next time after your</p> <p>3 Voice of America interview that you met or spoke with</p> <p>4 Guo?</p> <p>5 A Many times. Next time with -- I actually</p> <p>6 can't recall. And -- but I spoke to him -- I can't</p> <p>7 say "a lot," but time -- from time to time.</p> <p>8 Q Well, let me ask you this. Did you</p> <p>9 introduce anyone to Guo?</p> <p>10 A Yes. I introduced several reporters to</p> <p>11 Guo.</p> <p>12 Q Okay. Who did you introduce to Guo?</p> <p>13 A I think the -- the Harvard -- gosh.</p> <p>14 David -- no. I forgot his first -- Ignatius at</p> <p>15 Harvard Business Review, the chief editor.</p> <p>16 And also Bill Gertz of Washington Times and</p> <p>17 Washington Free Beacon.</p> <p>18 And -- and I also brought Scott Savitt,</p> <p>19 used to work for LA Times, and -- I forgot that kid's</p> <p>20 name.</p> <p>21 Q What was Mr. -- what's the Scott -- what's</p> <p>22 his last name?</p> <p>23 A Scott Savitt, S-a-u-v-i-t-t (sic), with --</p> <p>24 who was a reporter in Beijing in the '80s and who</p> <p>25 work for LA Times. He still write for the media.</p>	<p>1 sure I understand this. Were you talking with him</p> <p>2 about the media organization later in 2017?</p> <p>3 A Yes.</p> <p>4 Q And why do you say he wasn't interested?</p> <p>5 A Well, you can tell some -- because I --</p> <p>6 specifically, I told him the separation between</p> <p>7 ownership and editorial, and he said, "That's</p> <p>8 impossible."</p> <p>9 And I was thinking, you know, you got to</p> <p>10 understand that. That's the foundation of American</p> <p>11 free media.</p> <p>12 Q Did you -- so it sounds like you gave him</p> <p>13 advice on the media organization issue.</p> <p>14 What other topics do you remember</p> <p>15 discussing with him, let's just say, in the remainder</p> <p>16 of 2017?</p> <p>17 MS. CLINE: Objection. Again, none of this</p> <p>18 has anything to do with the contract between Eastern</p> <p>19 Profit and Strategic Vision. This is a waste of</p> <p>20 time.</p> <p>21 THE WITNESS: Yes. Well, actually a lot.</p> <p>22 How did he -- how did he work with the Chinese</p> <p>23 government or the corruption?</p> <p>24 I specifically asking questions as -- I</p> <p>25 think my question's how he work with the North Korean</p>
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<p>1 Q Why did you introduce Guo to these</p> <p>2 individuals?</p> <p>3 A To me, that's a media story. Any of my</p> <p>4 media colleagues wants me to make an introduction, I</p> <p>5 do.</p> <p>6 Q After the -- after your meeting with Guo in</p> <p>7 his apartment, the two meetings that we just talked</p> <p>8 about, when was the next time that you were there?</p> <p>9 A The next time what?</p> <p>10 Q That you were in Guo's apartment.</p> <p>11 MS. CLINE: Objection; relevance.</p> <p>12 THE WITNESS: I honestly can't recall. A</p> <p>13 few months later.</p> <p>14 Q (By Mr. Greim) Do you remember the purpose</p> <p>15 for your next visit to Guo's apartment?</p> <p>16 A Well, Guo wants to set up a media</p> <p>17 organization. And so I actually sent -- sent him</p> <p>18 something and then talked with him about how American</p> <p>19 media organizations is set up.</p> <p>20 I said, first, it's the separation between</p> <p>21 ownership and editorial. You have to have -- the</p> <p>22 corporate board should be different from the</p> <p>23 editorial board. So, apparently, he wasn't</p> <p>24 interested.</p> <p>25 Q Oh, why -- why do you -- I want to make</p>	<p>1 Dictator, Kim Jong-il.</p> <p>2 He said he -- Kim Jong-un and his father,</p> <p>3 Kim Jong-il, they had -- because they said he knew</p> <p>4 them, the whole family, very well. He was close to</p> <p>5 the family.</p> <p>6 So I specifically asked him about the --</p> <p>7 the -- the -- the smuggling. The smuggling, which --</p> <p>8 actually -- forgive me, it's the -- the name -- now</p> <p>9 I -- Golden -- what's the comp- -- name of your</p> <p>10 company you're representing?</p> <p>11 MS. CLINE: Eastern Profit.</p> <p>12 THE WITNESS: Dong Li. Now I know. Yes,</p> <p>13 it's related. Now I'm excited as a reporter. Yeah,</p> <p>14 Eastern Profit and Golden Spring, right? Are you</p> <p>15 representing Golden Spring as well?</p> <p>16 Q (By Mr. Greim) Let me just ask the</p> <p>17 witness -- this is -- the format for this is that I</p> <p>18 will ask you questions and you will --</p> <p>19 A Sorry.</p> <p>20 Q -- you'll -- so -- so --</p> <p>21 A Again --</p> <p>22 Q So, please -- okay. Let --</p> <p>23 A Because --</p> <p>24 Q Just -- just -- I'd just ask you to stop</p> <p>25 for a second. Okay?</p>

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<p>1 A Yeah.</p> <p>2 Q Let me ask you a question, and then I want</p> <p>3 you to answer my question. Okay?</p> <p>4 A Okay.</p> <p>5 Q Because without that, it is going to be</p> <p>6 hard for us to go through the transcript and</p> <p>7 understand --</p> <p>8 A All right.</p> <p>9 Q -- what you've said. Okay?</p> <p>10 So let me ask you this. Okay. First of</p> <p>11 all, I think you just said a name, Dong Li?</p> <p>12 A Yes. Because I --</p> <p>13 Q Can -- can you, first of all, spell that</p> <p>14 for us? What is it?</p> <p>15 A Dong is the last name -- but not -- Jesus,</p> <p>16 I'm sorry. It's spelled like D-o-n-g, L-i.</p> <p>17 Q Okay. What is -- what is Dong Li?</p> <p>18 A That was -- Dong Li was one of Guo's two</p> <p>19 companies, according to the Chinese media.</p> <p>20 The other is Jing Quan, J-i-n-g, Q-u-a-n,</p> <p>21 and in English, it should be Golden Spring. That's</p> <p>22 what I read.</p> <p>23 Q Does Dong Li have an English name?</p> <p>24 A I don't know. Maybe that's the name of</p> <p>25 your client.</p>	<p>1 A Corruption.</p> <p>2 Q Okay. Corruption involving who?</p> <p>3 A Involving one of -- Zhou Yongkang.</p> <p>4 Z-h-o-u, last name, first name, Y-o-n-g-k-a-n-g. And</p> <p>5 there -- there are reports -- there are reports</p> <p>6 indicating that Guo was -- that guy was very</p> <p>7 high-ranking. He was the top of China's whole legal</p> <p>8 system in the party -- in the party system. And he</p> <p>9 was arrested and the report said they actually found</p> <p>10 seven trucks of cash in his home.</p> <p>11 And I was -- I wasn't present. I could</p> <p>12 not testify, but that was a huge case. That case</p> <p>13 involved -- involved hundreds of billions -- I mean,</p> <p>14 billions in the "B" -- dollars of corruption. And</p> <p>15 report -- reports indicate that Guo -- Mr. Guo had</p> <p>16 something to do with it.</p> <p>17 Q Did you discuss this with Guo?</p> <p>18 A I asked him about it.</p> <p>19 He said he has the whole file.</p> <p>20 And I said, "When can you show me?"</p> <p>21 He did not show me.</p> <p>22 Q Okay. What other topics did you discuss</p> <p>23 with Guo in 2017?</p> <p>24 A That's --</p> <p>25 Q Let -- let -- let me ask you this. Did Guo</p>
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<p>1 Q Okay.</p> <p>2 A Eastern Profit. It's -- because that's the</p> <p>3 meaning.</p> <p>4 Q All right. Let -- let -- let's go back.</p> <p>5 Let's go -- we'll -- the question -- and I want to</p> <p>6 make sure we get a full answer to this -- is: What</p> <p>7 other topics did you discuss with Mr. Guo?</p> <p>8 And we're going to go through the remainder</p> <p>9 of 2017.</p> <p>10 A Yeah. How did he involved in armed</p> <p>11 smuggling in 2 -- nuclear smuggling in North</p> <p>12 Korea -- to North Korea. Was he part of China's</p> <p>13 efforts there?</p> <p>14 Q Okay.</p> <p>15 A He said he had --</p> <p>16 Q That --</p> <p>17 A -- all the record.</p> <p>18 Q Hold on. Let's just stop. Okay? I just</p> <p>19 want to list the topics. Okay? Otherwise, we'll</p> <p>20 have a narrative answer --</p> <p>21 A All right.</p> <p>22 Q -- on some of these. Okay?</p> <p>23 A Okay.</p> <p>24 Q And so that's one topic. What are some</p> <p>25 other topics you discussed with him?</p>	<p>1 tell you that he was considering a project to</p> <p>2 research certain relatives of Chinese officials who</p> <p>3 were either in the U.S. or abroad?</p> <p>4 A He said that on air.</p> <p>5 Q Okay.</p> <p>6 A He said that he hires the best</p> <p>7 investigative companies in the world to -- he would</p> <p>8 investigate all those people and get them to the --</p> <p>9 to jail. So I was very curious as -- as well.</p> <p>10 Q Okay. Did you discuss that with him</p> <p>11 yourself?</p> <p>12 A He's very secretive about that. I tried.</p> <p>13 Q Okay. Did -- did Mr. Guo mention</p> <p>14 Strategic Vision to you in 2017?</p> <p>15 A No, I never heard of it.</p> <p>16 Q Okay. Did he mention them to you in 2018?</p> <p>17 A Never heard of -- no, I never -- that was</p> <p>18 never a subject between my condition -- but Guo</p> <p>19 actually did mention once, he said there are two --</p> <p>20 he was swindled by two Americans. That was this</p> <p>21 year.</p> <p>22 He actually gave me the whole court file.</p> <p>23 I think I saw it somewhere in the -- I think</p> <p>24 that's -- that was in -- I think in late May or early</p> <p>25 June this year.</p>

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<p style="text-align: right;">Page 49</p> <p>1 And -- and Guo -- well, the previous night,</p> <p>2 Guo and I, Steve Bannon and a couple of us have</p> <p>3 dinner.</p> <p>4 And Guo said, "Would you come and pick up</p> <p>5 some documents? It's important to me. It's</p> <p>6 important."</p> <p>7 I said, "Okay. Well, I will stop by."</p> <p>8 So next day -- I actually have a picture of</p> <p>9 it -- stopped by Guo's hotel, Hay-Adams. He gave me</p> <p>10 three big -- big, thick files. He said was -- I</p> <p>11 never opened that because the files look -- you know,</p> <p>12 and at that time I was rushing to Europe, so I -- and</p> <p>13 he gave me a whole big copy of that.</p> <p>14 Q Okay. And so if you didn't open it, how</p> <p>15 did you know that it was the file from this case?</p> <p>16 A I did not open to read it, I just read --</p> <p>17 you know, I don't even make the connection because</p> <p>18 it's -- it's not interesting. To me, it's not</p> <p>19 interesting. I was -- then I was rushing to Europe</p> <p>20 for a whole month.</p> <p>21 Q Let me ask you about a few other people,</p> <p>22 then we'll return to Mr. Guo.</p> <p>23 Do you know Steve Bannon?</p> <p>24 A Yes.</p> <p>25 Q How do you know him?</p>	<p style="text-align: right;">Page 51</p> <p>1 A No, because I -- you know, that was a</p> <p>2 meeting. Guo took us back to Hay-Adams, and Bannon</p> <p>3 was there at the door and John Thornton was there at</p> <p>4 the door.</p> <p>5 Q Okay. Did you observe Guo talking to</p> <p>6 Bannon?</p> <p>7 A No. Guo -- Guo went to talk to John</p> <p>8 Thornton. I went to talk to Bannon.</p> <p>9 Q Okay. What did -- okay. So you spoke with</p> <p>10 Mr. Bannon at that point?</p> <p>11 A Yes. And first thing I said, "Mr. Bannon,</p> <p>12 I want an interview." That's what I said.</p> <p>13 Q Okay. Did you talk about Mr. Guo with</p> <p>14 Mr. Bannon?</p> <p>15 A No. No. I -- I just want -- I talk to --</p> <p>16 his nephew, Shawn, was there. What -- what I want</p> <p>17 was to set up the date and time and -- for an</p> <p>18 interview. I'm very hungry for interviews.</p> <p>19 Q Okay. Well, let's -- okay. Let's -- let's</p> <p>20 move on.</p> <p>21 Do you know Lianchao Han?</p> <p>22 A Very well, for 30 years.</p> <p>23 Q And have you discussed this case with</p> <p>24 Mr. Han?</p> <p>25 A Which case?</p>
<p style="text-align: right;">Page 50</p> <p>1 A I think I first met him in 2010, in the Tea</p> <p>2 Party Movement or something, but I was there meeting</p> <p>3 with Andrew -- Andrew -- Andrew Breitbart, and I did</p> <p>4 not met -- remember him that well, but that was a</p> <p>5 meeting I think both of us remembered later.</p> <p>6 So the first time I met him was early 2018.</p> <p>7 I forgot when. That was the day when Guo came to</p> <p>8 Washington, live in Hay-Adams.</p> <p>9 I met with Steve Bannon, but that was</p> <p>10 also -- in some meetings I -- that was not important</p> <p>11 at -- because -- and then that's -- that night Guo</p> <p>12 and I and my colleagues came back to Hay-Adams, and I</p> <p>13 saw Steve Bannon standing there, shaking hands.</p> <p>14 And the one that got 20 feet away from him</p> <p>15 was John Thornton from, I think -- well, now he's</p> <p>16 from China now. So because John Thornton --</p> <p>17 Q Wait. Let's stop. Let's stop here.</p> <p>18 A Okay.</p> <p>19 Q I just -- I want to -- let's try to focus</p> <p>20 this. Okay?</p> <p>21 So did you -- it sounds like there was an</p> <p>22 early 2018 meeting. Was there an actual meeting</p> <p>23 involving you, Guo, and Mr. Bannon?</p> <p>24 A No.</p> <p>25 Q No.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q The Strategic -- Eastern Profit versus</p> <p>2 Strategic Vision, the case that you're --</p> <p>3 A No.</p> <p>4 Q -- you're on now.</p> <p>5 A Because I think Lianchao got very depressed</p> <p>6 on this and Lianchao sent on -- sent out Tweet that</p> <p>7 both side have problems and -- something.</p> <p>8 I think, as a friend, I -- I'm very</p> <p>9 considerate. I just don't want to, you know, raise</p> <p>10 that uncomfortable issue.</p> <p>11 Q Okay. Have you spoken with him about the</p> <p>12 Strategic Vision research project?</p> <p>13 A No.</p> <p>14 Q Okay. And earlier you said you introduced</p> <p>15 Mr. Guo to Bill Gertz. Did you already know</p> <p>16 Mr. Gertz?</p> <p>17 A Yes, for years.</p> <p>18 Q How -- how did you know him?</p> <p>19 A We're both reporters, so I think</p> <p>20 specifically 2012 or '13, something, he came to my</p> <p>21 office and we discuss a -- a research proj -- not a</p> <p>22 re -- a reporting subject.</p> <p>23 Q Have you spoken with Mr. Gertz about this</p> <p>24 case?</p> <p>25 A Again, the Eastern --</p>

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<p style="text-align: right;">Page 57</p> <p>1 Q (By Mr. Greim) Okay. Fair – fair enough.</p> <p>2 Let – let me ask you this.</p> <p>3 MS. CLINE: Let me just -- let me just put</p> <p>4 a -- an objection on the record.</p> <p>5 The way the deposition is proceeding, it's</p> <p>6 hard to interject with objections, and it's difficult</p> <p>7 for me to discern what the witness is testifying to</p> <p>8 based on her own knowledge versus based on what folks</p> <p>9 have told her.</p> <p>10 So I have lots of foundation objections, in</p> <p>11 addition to relevance and everything else, but I just</p> <p>12 want to -- just want to note that I have an ongoing</p> <p>13 objection to foundation and relevance, and I'm having</p> <p>14 a really hard time understanding the basis for the</p> <p>15 witness's testimony.</p> <p>16 THE WITNESS: Okay.</p> <p>17 MR. GREIM: Right. Right.</p> <p>18 THE WITNESS: Let me defend my</p> <p>19 reputation --</p> <p>20 MR. GREIM: No, no.</p> <p>21 THE WITNESS: -- as a reporter.</p> <p>22 Q (By Mr. Greim) No, no. No, no. Hold on.</p> <p>23 It's not about your reputation as a reporter. This</p> <p>24 is about -- this is not about you, it is about the</p> <p>25 way the questions are being asked and laying the</p>	<p style="text-align: right;">Page 59</p> <p>1 okay, and the reason for his arrest.</p> <p>2 Are the things that you told us consistent</p> <p>3 with the things that he told you?</p> <p>4 A No.</p> <p>5 Q Okay. What did he tell you?</p> <p>6 A Very wake (phonetic). Let me say really</p> <p>7 awake (phonetic). He said he was in jail be- --</p> <p>8 because he supported Tiananmen movement, and he</p> <p>9 donated a lot of money, according to him.</p> <p>10 However, I check with all Tiananmen student</p> <p>11 movement leaders who I can find here. Nobody</p> <p>12 remembered.</p> <p>13 Q Okay.</p> <p>14 MS. CLINE: Again, Eddie, we'll -- we'll</p> <p>15 have to sort this out, but there's a -- there's a</p> <p>16 blurry line between her testimony as a fact witness,</p> <p>17 based on firsthand knowledge, and her -- her work as</p> <p>18 a reporter.</p> <p>19 And so I have -- to the extent she's</p> <p>20 testifying as to things she found out from other</p> <p>21 people when she was reporting, we'll have foundation</p> <p>22 and hearsay objections and all of that. And we'll</p> <p>23 have to -- if you're going to try to get this into</p> <p>24 trial, we're going to have a -- a mess.</p> <p>25 MR. GREIM: I -- I understand. We're</p>
<p style="text-align: right;">Page 58</p> <p>1 proper foundation and the way I'm asking you</p> <p>2 questions.</p> <p>3 There's -- opposing counsel's not attacking</p> <p>4 you in any way. So --</p> <p>5 A But, still, I want to say that --</p> <p>6 Q No, no. But --</p> <p>7 A I would not say --</p> <p>8 Q But you can't.</p> <p>9 A -- anything in single source.</p> <p>10 Q Okay. Thank you. But here's what we have</p> <p>11 to do. Whoever reads this transcript needs to be</p> <p>12 able to understand the basis for the statements that</p> <p>13 you are making, and they are either going to be</p> <p>14 admissible or they're not going to be admissible.</p> <p>15 So our job here is to make clear to the</p> <p>16 person who finds the facts where this information's</p> <p>17 coming from. Okay?</p> <p>18 So I'm now going to ask you -- let's go</p> <p>19 back a little bit to the discussions you directly</p> <p>20 have had with Mr. Guo. Okay?</p> <p>21 And so my question to you is: Did you</p> <p>22 discuss Mr. Guo's background with him?</p> <p>23 A Yes, I did.</p> <p>24 Q Okay. And the things that you just told us</p> <p>25 about Mr. Guo's -- let's start with his time in jail,</p>	<p style="text-align: right;">Page 60</p> <p>1 doing -- we're doing the best we can with the sources</p> <p>2 we can get. And so we're just going to -- what we</p> <p>3 can do today is try to be clear. We can try to</p> <p>4 preserve your objections and understand the basis for</p> <p>5 the witness's testimony.</p> <p>6 Q (By Mr. Greim) And -- okay. So let's --</p> <p>7 let's go ahead.</p> <p>8 Now, the information about Mr. Guo going to</p> <p>9 Hong Kong, okay, is that consistent with what Mr. Guo</p> <p>10 has told you personally?</p> <p>11 MS. CLINE: Objection to form; foundation.</p> <p>12 THE WITNESS: Yes.</p> <p>13 Q (By Mr. Greim) Okay. And do you have an</p> <p>14 understanding about whether it would be common for</p> <p>15 the Chinese regime in this period to allow someone</p> <p>16 who is on probation to go to Hong Kong to work?</p> <p>17 MS. CLINE: Objection; foundation.</p> <p>18 THE WITNESS: I never heard of it.</p> <p>19 And, also, the Hong Kong government,</p> <p>20 under -- at that time still under the British rule,</p> <p>21 would not allow a convicted felon -- felon to go and</p> <p>22 change his name and date of birth.</p> <p>23 Q (By Mr. Greim) Okay. Well, let me ask you,</p> <p>24 did Mr. Guo change his name and date of birth in</p> <p>25 Hong Kong?</p>

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<p style="text-align: right;">Page 61</p> <p>1 A Yes.</p> <p>2 Q Okay. And what's the basis for your</p> <p>3 understanding of that?</p> <p>4 A I asked Mr. Guo, "Why would you have three</p> <p>5 different date of births, '67, '68, and '70?"</p> <p>6 And he said, well, his mother mis-memorized</p> <p>7 his birth date.</p> <p>8 He had seven -- he had seven other -- eight</p> <p>9 brothers, sisters, you know. Why would his mother --</p> <p>10 a mother mis- -- well, make such a mistake? That's a</p> <p>11 very peculiar thing, and I questioned him more than</p> <p>12 once.</p> <p>13 Q What about his name changes? Did he</p> <p>14 explain why he changed his name in Hong Kong?</p> <p>15 A I did not question him. And my</p> <p>16 understanding is that his name, Wengui Guo, was sort</p> <p>17 of very country bumpkin type of name. He wants a</p> <p>18 more high -- higher-status name in Hong Kong. That's</p> <p>19 my understanding. He did not tell me that.</p> <p>20 Q Okay. Did Mr. Guo tell you how he was able</p> <p>21 to amass wealth after he returned from Hong Kong?</p> <p>22 A No. I tried to ask him. I tried, but he</p> <p>23 never answer that question.</p> <p>24 Q What did Mr. Guo tell you about his</p> <p>25 activities in China between the time he came back</p>	<p style="text-align: right;">Page 63</p> <p>1 name Wang, W-a-n-g, first name Juntao,</p> <p>2 J-u-n-tay- t-a-o.</p> <p>3 Mr. Wang was accused by the Chinese</p> <p>4 government to be the black hand behind the Tiananmen</p> <p>5 movement. And Mr. Zhang participated and escorted,</p> <p>6 in a way, Mr. Wang when they arrested Mr. Wang.</p> <p>7 So he also interrogated several other my</p> <p>8 dissident friends, like Mr. Wei Jingsheng. Last name</p> <p>9 W-e-i, first name J-i-n-g-s-h-e-n-g. Mr. Wei</p> <p>10 Jingsheng spent 18, 19 years in jail, the most famous</p> <p>11 dissident in China.</p> <p>12 The last time he saw Mr. Zhang Yue was when</p> <p>13 Bill Clinton's government demanded Mr. Wei's release.</p> <p>14 And when he was released and sent to airport,</p> <p>15 Mr. Zhang was accompanying him there.</p> <p>16 So Mr. Zhang clearly, according to all my</p> <p>17 friends, dissident friends, many of them, he was a</p> <p>18 leading figure in controlling or suppressing the</p> <p>19 Chinese pro-democracy movement. And, yet, he's</p> <p>20 Mr. Guo's close friend.</p> <p>21 And that's when -- the time I was wondering</p> <p>22 where he could get my files. And Mr. Zhang is the</p> <p>23 very -- perhaps a very good source. I can't testify</p> <p>24 for that.</p> <p>25 Q Okay. Let -- let me ask you --</p>
<p style="text-align: right;">Page 62</p> <p>1 from Hong Kong and the time he left China?</p> <p>2 A He said he build real estate and he made</p> <p>3 lots of friends, high-ranking friends, and he became</p> <p>4 one of the major players, according to him, in the</p> <p>5 Chinese intelligence community.</p> <p>6 And, at that time, I questioned him on air</p> <p>7 in 2000 -- in April sev- -- 8/19, 2018, on air. I</p> <p>8 was -- I focus very much on two people who is his</p> <p>9 associate.</p> <p>10 Q Okay.</p> <p>11 A One of his associate. One is the --</p> <p>12 Q Okay. Who were those two people?</p> <p>13 A The first one, it's a -- a guy named</p> <p>14 Zhang Yue. Last name Zhang, Z-h-a-n-g, first name</p> <p>15 Yue, Y-u-e.</p> <p>16 The reason I was interested in Zhang --</p> <p>17 Mr. Zhang closest. Guo admitted on air many times</p> <p>18 that Mr. Zhang Yue was his close friend and he</p> <p>19 appreciated Mr. Zhang very much.</p> <p>20 But this Mr. Zhang, I know some of his</p> <p>21 background, and Mr. Zhang was -- was a commissar in</p> <p>22 the biggest Chinese prison in -- in the -- after</p> <p>23 Tiananmen movement. He interrogated many of my</p> <p>24 friends. He participated in arresting one of my very</p> <p>25 good friends for 40 years, Mr. Wang Juntao. Last</p>	<p style="text-align: right;">Page 64</p> <p>1 MS. CLINE: Let me just lodge an objection.</p> <p>2 Again, foundation. Sounds like she's reporting on</p> <p>3 what others have told her. It's not firsthand</p> <p>4 knowledge.</p> <p>5 Q (By Mr. Greim) What did Mr. --</p> <p>6 A I have them on air on -- I -- I have him on</p> <p>7 air. He told me. Mr. Guo told me. It's not other</p> <p>8 people told me. I also inter- -- interview other</p> <p>9 people on the record, not off the record.</p> <p>10 Q Let -- let me ask you what Mr. -- so what</p> <p>11 did Mr. Guo tell you about Mr. Zhang Yue?</p> <p>12 A He refused to tell me what his function.</p> <p>13 He just say he's a very good friend, he's such a</p> <p>14 great guy, he run, he have -- has good figure, and</p> <p>15 he -- his body is so lean, or something like that.</p> <p>16 He refuse to tell me what was Mr. Zhang's</p> <p>17 function. Even that was in the record. He looks</p> <p>18 like -- when I question him on air, look like he's</p> <p>19 obsessed with Mr. Zhang's body instead of his</p> <p>20 function.</p> <p>21 Q Okay. Well, who is the second person that</p> <p>22 you asked Mr. Guo about?</p> <p>23 A That was Mr. Liu. Last name -- Liu Zhihua.</p> <p>24 Last name L-i-u, Liu, first name Zhihua, Z-h-i-h-u-a.</p> <p>25 Q I'm sorry, could you give the -- the first</p>

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<p>1 name again?</p> <p>2 A Liu, L-i-u -- oh, the first name.</p> <p>3 Z-h-i-h-u-a.</p> <p>4 Q Very well. Thank you.</p> <p>5 A Mr. Liu -- Mr. Liu was the vice-mayor of</p> <p>6 Beijing. Very, very powerful figure. So this is</p> <p>7 also a very famous case. I questioned Mr. Guo</p> <p>8 several times to the extent that he complain on air</p> <p>9 that I was the only one who would follow the case.</p> <p>10 This is the case. So not -- this is firsthand</p> <p>11 knowledge.</p> <p>12 Q Okay.</p> <p>13 A Mr. Liu was vice-mayor in Beijing. And in</p> <p>14 2003, Mr. Guo obtained a prime real estate, a piece</p> <p>15 of land. I think it's the Golden -- Golden Profit?</p> <p>16 No. Golden -- some -- one of his companies. It may</p> <p>17 be your company. Anyway, a piece of land, prime land</p> <p>18 in Beijing, and -- and tried to develop it.</p> <p>19 And -- but Mr. Liu, as the vice-mayor of</p> <p>20 Beijing, a powerful vice -- vice-mayor in Beijing,</p> <p>21 took the land and gave it to some other company.</p> <p>22 So Mr. Guo -- this is firsthand knowledge.</p> <p>23 Again, Mr. Guo told me. And I -- I read a lot of</p> <p>24 reports. And it said he went to see Mr. Liu.</p> <p>25 And Mr. Liu goes, "Who the hell are you?"</p>	<p>1 the -- was in charge of international espionage?</p> <p>2 A Chinese government document.</p> <p>3 Q What did Mr. Guo tell you about Mr. Jian?</p> <p>4 A Mr. -- Mr. Ma, not Mr. Jian.</p> <p>5 Q I'm sorry, Mr. Ma. Yes.</p> <p>6 A Mr. Ma.</p> <p>7 Q Uh-huh.</p> <p>8 A Guo said they became very close friends.</p> <p>9 And with Mr. Ma Jian's direction -- Mr. Ma's</p> <p>10 direction, Guo mobilize many personnels and other</p> <p>11 mechanism to follow Mr. Liu, vice-mayor Liu Zhihua,</p> <p>12 for more than a year recording whatever he -- well,</p> <p>13 his activities. And they recorded his sex -- sexual</p> <p>14 relationship, a sex tape with his -- with his -- with</p> <p>15 his lover --</p> <p>16 Q So --</p> <p>17 A -- one of his lovers.</p> <p>18 Q So how did Guo tell you that he used that</p> <p>19 information?</p> <p>20 A Guo told me --</p> <p>21 MS. CLINE: Objection to form.</p> <p>22 THE WITNESS: Yeah. Not only Guo told me,</p> <p>23 it's also publicize, and Guo -- and he -- he took the</p> <p>24 sex tape -- because the woman involved in the sex</p> <p>25 tape was related to the company who took his land.</p>
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<p>1 Said, "Well, I am not going to" -- you know, you're</p> <p>2 nobody.</p> <p>3 And Mr. Guo said, "Let -- let's see if I'm</p> <p>4 nobody." So --</p> <p>5 MS. CLINE: I'm sorry, is there a question</p> <p>6 pending?</p> <p>7 Q (By Mr. Greim) There is. I'm asking her</p> <p>8 what Mr. Guo told her about Mr. Liu. So why --</p> <p>9 A Yes.</p> <p>10 Q Why don't we do this. What -- what did</p> <p>11 Mr. Guo tell you that he told Mr. Liu after Mr. Liu</p> <p>12 would -- took the property?</p> <p>13 A He said, "Just wait, see who I am."</p> <p>14 Q So what --</p> <p>15 A So what happened is that later Mr. Guo</p> <p>16 and -- went to look for Mr. Ma Jian. Last name Ma,</p> <p>17 M-a, first name Jin, J-i-n (sic).</p> <p>18 Ma Jian at that time was a bureau chief in</p> <p>19 the Chinese MSS, the Minister of State Security, and</p> <p>20 later became the deputy of the Minister of Public</p> <p>21 Security and -- who was in charge -- that's on the</p> <p>22 record -- in charge of international espionage.</p> <p>23 Q Now, wait a second.</p> <p>24 A China -- uh-huh.</p> <p>25 Q Who -- who told you that Mr. Jian was</p>	<p>1 And Guo took that tape and directly went</p> <p>2 into Zhongnanhai, where the Communist Party leaders</p> <p>3 live, and he gave the tape to Mr. Hu Jintao.</p> <p>4 Guo said several times he was one of three</p> <p>5 people who could go to Hu Jintao's place without</p> <p>6 appointment. So --</p> <p>7 Q (By Mr. Greim) Now, I'm sorry --</p> <p>8 A Uh-huh.</p> <p>9 Q -- let -- let's stop there.</p> <p>10 A Uh-huh.</p> <p>11 Q This name, "Hu Jintao" --</p> <p>12 A Okay.</p> <p>13 Q -- I think I recognize that, but let me --</p> <p>14 let me try this. Is it H-u, last name? First name,</p> <p>15 J-i-n-t-a-o?</p> <p>16 A Yes, that's the correct -- correct spell.</p> <p>17 Q Okay.</p> <p>18 A And he was the number one -- the general</p> <p>19 secretary of the Chinese Communist Party, the most</p> <p>20 powerful person in China.</p> <p>21 Q Now, let me ask you, did Mr. Guo -- is it</p> <p>22 Mr. Guo who told you that he was one of three people</p> <p>23 who -- well, let -- let -- let me just ask you.</p> <p>24 What did Mr. Guo tell you about his</p> <p>25 relationship to Mr. Hu?</p>

17 (Pages 65 to 68)

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<p style="text-align: right;">Page 69</p> <p>1 A Mr. Guo told me he -- well, first, he has a</p> <p>2 very close relationship with Mr. Hu's wife. Name is</p> <p>3 Liu Yongqing -- last name L-i-u, first name</p> <p>4 Y-o-n-g-q-i-n-g -- who is also very powerful in</p> <p>5 Beijing's real estate development, who was in charge</p> <p>6 of the Beijing Planning Commission or something.</p> <p>7 Anyway, so Mr. Guo did not only tell me, he</p> <p>8 told the whole world that he's close to Hu, and he</p> <p>9 was among three people who can -- who could go to</p> <p>10 Hu's place without appointment.</p> <p>11 Q Okay. So let -- let's move forward with</p> <p>12 this, and then we'll move on to -- to another topic.</p> <p>13 What did -- what -- what was Mr. Hu --</p> <p>14 well, let me strike that.</p> <p>15 What did Guo tell you that Mr. Hu did for</p> <p>16 him once he gave him the tape?</p> <p>17 A Well, Mr. Hu was very angry, and Mr. Hu</p> <p>18 ordered to arrested -- to arrest Mr. Liu. And</p> <p>19 Mr. Liu was sentenced to death -- suspended -- given</p> <p>20 a suspended death sentence, and he's still in jail.</p> <p>21 Q And how did this benefit Mr. Guo? What --</p> <p>22 what did he tell you?</p> <p>23 A Mr. Guo took --</p> <p>24 MS. CLINE: Objection.</p> <p>25 THE WITNESS: -- the land --</p>	<p style="text-align: right;">Page 71</p> <p>1 A That's what he said.</p> <p>2 Q A medal from who?</p> <p>3 A From the Minister of Public -- of -- of</p> <p>4 State Security, or from the Chinese government.</p> <p>5 Q Okay. What else did Mr. Guo tol -- tell</p> <p>6 you that he did on behalf of the MSS?</p> <p>7 MS. CLINE: Objection to form.</p> <p>8 THE WITNESS: Another case that I</p> <p>9 remember -- I talked -- was -- oh, no, he did not</p> <p>10 tell me that, I read about it, so I think I better</p> <p>11 not to talk about the Chen Lingyu case, but you guys</p> <p>12 can find it. He talk to the public.</p> <p>13 The case is -- last name Chen, C-h-e-n,</p> <p>14 first name L-i-n-g-y-u. In a media report -- and Guo</p> <p>15 said to the public that he helped to kidnap Chen</p> <p>16 Lingyu's son back to China using his private</p> <p>17 airplane.</p> <p>18 But that's not -- he -- I did not discuss</p> <p>19 with him that, and he discuss with the public that.</p> <p>20 Q (By Mr. Greim) Okay. Was this -- did this</p> <p>21 involve someone who was in Malaysia?</p> <p>22 A Yes.</p> <p>23 Q Okay. And so recognizing that you are now</p> <p>24 telling us what Guo has said in a broadcast, rather</p> <p>25 than in a direct conversation --</p>
<p style="text-align: right;">Page 70</p> <p>1 MS. CLINE: Objection.</p> <p>2 THE WITNESS: -- back.</p> <p>3 MR. GREIM: Okay.</p> <p>4 MS. CLINE: Objection.</p> <p>5 THE WITNESS: But the land is back.</p> <p>6 MS. CLINE: Objection --</p> <p>7 THE WITNESS: Everybody knows.</p> <p>8 MS. CLINE: -- to form. Objection;</p> <p>9 founda- -- lack of foundation.</p> <p>10 MR. GREIM: Let's let Counsel make her</p> <p>11 objection.</p> <p>12 Q (By Mr. Greim) My question to you is: What</p> <p>13 did Guo tell you about how this benefited him?</p> <p>14 A He took the land back. He build his</p> <p>15 trademark building on it, the Pangu Building.</p> <p>16 P-a-n-g-u. The Pangu Building.</p> <p>17 Q Okay. Did Mr. Guo discuss with you any</p> <p>18 other work that he did in cooperation with the MSS?</p> <p>19 MS. CLINE: Objection to form.</p> <p>20 THE WITNESS: Yes. He did say he'd visited</p> <p>21 Dalai Lama on behalf of the security of the MSS, and</p> <p>22 he got a medal for it.</p> <p>23 Q (By Mr. Greim) I'm sorry, a what for it?</p> <p>24 A He receive a medal.</p> <p>25 Q A medal.</p>	<p style="text-align: right;">Page 72</p> <p>1 A Right.</p> <p>2 Q -- with you, what did Guo say about his</p> <p>3 work on the Chen Lingyu matter?</p> <p>4 MS. CLINE: Just -- same objection.</p> <p>5 THE WITNESS: I -- actually, I did not</p> <p>6 focus on that case, so -- and my memory -- I can only</p> <p>7 testify for things I clearly memorize, date and</p> <p>8 stuff, as a reporter. For this, it's a very rare</p> <p>9 thing. You guys need to find out.</p> <p>10 I think what he said was he went to</p> <p>11 Malaysia and persuaded Chen Lingyu's son -- Chen</p> <p>12 Lingyu was -- was on trial. And he used his private</p> <p>13 airplane to kidnap his son back to China. That's all</p> <p>14 I can say which the only accurate part. Date and</p> <p>15 time and -- I cannot.</p> <p>16 Q (By Mr. Greim) Okay. Very well. Earlier</p> <p>17 you mentioned -- I -- I -- I'm not sure I followed --</p> <p>18 something about North Korea.</p> <p>19 Did Mr. Guo ever tell you about any</p> <p>20 activities he embarked upon for the CCP or PRC</p> <p>21 regarding North Korea?</p> <p>22 MS. CLINE: Objection; form, relevance.</p> <p>23 THE WITNESS: See, I try to ask him what</p> <p>24 his role. Since very few people got to -- according</p> <p>25 to his claim to me -- he knows the Kim family so well</p>

18 (Pages 69 to 72)

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<p>1 and he would, you know, dine with them and play with 2 them. He also witness Kim -- Kim Jong-un's sister 3 kill a horse and something. 4 If they're -- he's that close, he got to 5 have some role in China and North Korea. I tried to 6 question him. So he said he has the full record of 7 the truck goes in -- go in and out of the -- China, 8 because I know Korea border, and -- and I have no way 9 to verify. 10 Q (By Mr. Greim) Okay. 11 MS. CLINE: Objection; foundation. 12 Q (By Mr. Greim) When -- when did he make 13 this statement to you? 14 A A year ago, something like that. 15 MR. GREIM: Let's go ahead and take our 16 first break at this point, if that's okay. Maybe 17 just about ten minutes. 18 Is that okay with the reporter? 19 THE REPORTER: Sounds good. 20 MR. GREIM: Okay. Very good. Let's take 21 a -- 22 THE WITNESS: Okay. 23 MR. GREIM: -- ten-minute break. 24 THE WITNESS: Bathroom break. 25 VIDEOGRAPHER: Going off the record. The</p>	<p>1 A Somewhere in 2014. 2 Q Okay. And of a -- did he say if it was 3 earlier in 2014, later in 2014? 4 A I don't remember. 5 Q Did he tell you why he came to the U.S.? 6 A He said the Chinese might arrest him and 7 almost arrested his daughter. And, also, he told me 8 his son was lucky because ten minutes before he would 9 be arrested and he -- Guo got a tip and his son flew 10 out in their private airplane. That's all I can 11 remember. 12 Q Okay. So did he tell you why he believed 13 he was going to be arrested? 14 A Because his patron, Ma Jian, again, the 15 Deputy Minister of State Security, while -- thinks 16 that he would be -- he would be targeted in the 17 anti-corruption campaign. 18 Q Okay. Did Mr. Guo tell you what he first 19 did when he came to the United States? 20 A I -- I don't have much knowledge, except he 21 told me he continue to make business deals, 22 worldwide, and he says he made billions after he got 23 to the states. He had business in Japan, England, 24 and some other countries, something like that. 25 I have to say I don't understand the</p>
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<p>1 time is now 10:44 a.m. 2 MR. GREIM: Okay. 3 VIDEOGRAPHER: This ends Disc Number 1. 4 (Whereupon, a recess was had from 5 10:44 a.m. until 11:03 a.m.) 6 VIDEOGRAPHER: This begins Disc Number 2 in 7 the video deposition of Sasha Gong. We are back on 8 the record. The time is 11:03 a.m. 9 Q (By Mr. Greim) Ms. Gong, let's finish up 10 talking about Mr. Guo's activities. Let me ask you, 11 did he ever discuss with you whether he was acting as 12 a dissident against the regime when he was in China? 13 MS. CLINE: Objection to form. 14 THE WITNESS: No. 15 Q (By Mr. Greim) Did he ever tell you that, 16 during the time he was amassing his wealth, he was 17 also acting in opposition to the regime? 18 A No, I don't think so. 19 Q Now, at some point Mr. Guo came to the 20 United States, correct? 21 A Yes. 22 Q Okay. And what did Mr. Guo tell you about 23 why he came? 24 Well, first of all, what did Mr. Guo tell 25 you about when he came to the United States?</p>	<p>1 investment world much, so I did not pay much 2 attention. 3 Q Did Guo begin to speak out as a dissident 4 against China immediately after he came to the United 5 States? 6 MS. CLINE: Objection; form, foundation. 7 THE WITNESS: No, not until, like, sometime 8 last year. 9 Q (By Mr. Greim) In 2018? 10 A Yeah. 11 Q Well, what about when you interviewed him 12 in 2017? 13 A He -- in the interview, he -- actually, on 14 the record he claimed many times he's -- he was very 15 loyal to President Xi Jinping in China. He only 16 wanted to target the corrupt ones. But he thought 17 Xi Jinping was a good leader. 18 Q Did he express that view to you privately 19 as well? 20 A Yes. 21 Q What did he say? What -- why did he tell 22 you he thought President Xi was a good leader? 23 A Well -- 24 MS. CLINE: Objection to form. 25 THE WITNESS: -- I -- actually, I have</p>

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<p>1 other things to question. I thought that was --</p> <p>2 people who -- you know, who was so bought (phonetic)</p> <p>3 in to the Chinese corrupt system and express their</p> <p>4 opinion is fine.</p> <p>5 Q (By Mr. Greim) I'm sorry. Let me make sure</p> <p>6 I understand.</p> <p>7 A Yes.</p> <p>8 Q And maybe my question wasn't clear. Did --</p> <p>9 did Mr. Guo tell you why he thought President Xi was</p> <p>10 a good leader?</p> <p>11 MS. CLINE: Objection to form.</p> <p>12 THE WITNESS: Yeah, I did not question him</p> <p>13 that.</p> <p>14 Q (By Mr. Greim) Did Mr. Guo tell you about</p> <p>15 any business deals he tried to do in China after he</p> <p>16 came to the United States?</p> <p>17 A I don't recall any. And perhaps the</p> <p>18 company names and the stuff I actually have trouble</p> <p>19 to understand.</p> <p>20 However, there's one thing I -- I'm -- I'm</p> <p>21 thinking, you know, it's always in my mind. I got a</p> <p>22 little curious because I met with Yu Jianmin, a</p> <p>23 Chinese name -- last name Y-u, and first name</p> <p>24 J-i-a-n-m-i-n. I met him once. And Guo said he was</p> <p>25 his money man. That was right after the November 20,</p>	<p>1 Mr. Guo, me, and Lianchao Han, Steve Bannon and Bill</p> <p>2 Gertz.</p> <p>3 Q And why were you all getting together at</p> <p>4 Guo's apartment?</p> <p>5 A That was -- that day they -- Guo and Steve</p> <p>6 Bannon had a press conference. I -- I was present in</p> <p>7 that press conference. And after that, I got a phone</p> <p>8 call from -- I think from Wang Yin Ping (phonetic),</p> <p>9 Yvette.</p> <p>10 Q Right.</p> <p>11 A I'm not sure if that's from Yvette. I</p> <p>12 think it's from Yvette, said Mr. Guo invite you over</p> <p>13 to his apartment for lunch.</p> <p>14 So I went there with Lian- -- she said</p> <p>15 invite you and Lianchao and Bill. So I grabbed</p> <p>16 Bill -- Bill Gertz and Lianchao, and we left together</p> <p>17 and walked to Guo's apartment.</p> <p>18 Q Okay. This is in New York City?</p> <p>19 A In New York City, yes.</p> <p>20 Q Okay.</p> <p>21 A The Sherry-Netherland Hotel.</p> <p>22 Q So this is the lunch where you met Mr. Je?</p> <p>23 A Yes.</p> <p>24 Q And when I say that, I'm referring to --</p> <p>25 It's J-e, but it's the same person you've referred to</p>
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<p>1 2018, press conference.</p> <p>2 And so I went back to check Mr. Yu's -- or</p> <p>3 I think his English name's William Je, J-e. I went</p> <p>4 to check on his background.</p> <p>5 I said, "Why would Guo have somebody who</p> <p>6 clearly work so closely and be part of the Chinese</p> <p>7 government, work so closely with him?"</p> <p>8 At that point, that was always my question.</p> <p>9 Q Now, what --</p> <p>10 MS. CLINE: Let me just object. As to some</p> <p>11 other portions of the testimony, it's not clear which</p> <p>12 was based on personal knowledge and what she was --</p> <p>13 Q (By Mr. Greim) Well --</p> <p>14 MS. CLINE: -- investigating.</p> <p>15 Q (By Mr. Greim) Sure. Let's unpack that.</p> <p>16 Okay?</p> <p>17 A Okay.</p> <p>18 Q Let's unpack that. So -- first of all, let</p> <p>19 me just ask you this. Have you met an individual</p> <p>20 named William Je or William Yu?</p> <p>21 A Yes, I have, once.</p> <p>22 Q Okay. When was that?</p> <p>23 A On November 20, for lunch, 2018.</p> <p>24 Q Okay. And who was present?</p> <p>25 A Mr. Guo -- that's in Guo's apartment.</p>	<p>1 as William Yu or Yu Jianmin?</p> <p>2 A Yes. And I talked to him. He is from</p> <p>3 Hong Kong, clearly from accent. I am Cantonese, so I</p> <p>4 speak Cantonese, and I spoke Cantonese with him.</p> <p>5 Q Okay. And what -- what did Mr. Guo say</p> <p>6 when he introduced you to Mr. Yu?</p> <p>7 A Guo said, "He's the money guy."</p> <p>8 Q What else did Mr. Guo say about Mr. Je?</p> <p>9 Well, I'll go with "Mr. Je." Okay.</p> <p>10 A Okay.</p> <p>11 Q What else did Mr. Guo say about Mr. Je?</p> <p>12 A I don't recall, but later -- I actually</p> <p>13 think Mr. Bannon or -- and Lianchao also know he's</p> <p>14 the money guy because we have a conversation a few</p> <p>15 days after that lunch, and it was in Mr. Bannon's</p> <p>16 home in the Breitbart embassy.</p> <p>17 And Lianchao and I -- and that was</p> <p>18 Mr. Bannon's birthday party. Oh, God, his birthday</p> <p>19 is, like -- anyway, so --</p> <p>20 Q That was -- so it was around late</p> <p>21 November of 2018?</p> <p>22 A November, I think, 24th and 25th, something</p> <p>23 like that, a few days later. You can check his</p> <p>24 birthday. I don't remember, but I know it was a few</p> <p>25 days later.</p>

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<p style="text-align: right;">Page 81</p> <p>1 Q Okay. So you were at Mr. Bannon's house</p> <p>2 for a birthday party in Washington, D.C., and you</p> <p>3 were in the presence of Mr. Bannon and Mr. Han?</p> <p>4 A Yes, because Mr. Bannon want to talk us --</p> <p>5 talk to us about Guo. And I told Mr. Bannon that I</p> <p>6 doubt Guo would pay for that hundred million dollars</p> <p>7 he -- he promised. So that was -- I have my reasons,</p> <p>8 but I told Mr. Bannon I don't think he would get the</p> <p>9 money.</p> <p>10 Q Okay.</p> <p>11 A And Mr. Han then said to me and Mr. Bannon</p> <p>12 that, "Well, William Je is a quite honest person, and</p> <p>13 ask him, he may pay."</p> <p>14 That's what relate to Mr. Je -- Je.</p> <p>15 Q Okay. So I don't forget this, was there</p> <p>16 any other discussion with Mr. Bannon or Mr. Han at</p> <p>17 that time about Mr. Guo or Mr. Je?</p> <p>18 A That's the only discussion related to this.</p> <p>19 Is Mr. Je have anything to do with --</p> <p>20 Q No. No. You can't -- remember --</p> <p>21 A Sorry.</p> <p>22 Q Remember now, you're not acting -- we are</p> <p>23 questioning you today, Ms. Gong.</p> <p>24 A Okay.</p> <p>25 Q Okay?</p>	<p style="text-align: right;">Page 83</p> <p>1 would not, at least as the director, allow any</p> <p>2 Chinese money to taint our politics and our,</p> <p>3 whatever, organization.</p> <p>4 And then I check and found out the ACA and</p> <p>5 CAA are two different things and -- which I'm -- I'm</p> <p>6 not sure if ACA is also Sovereign Fund.</p> <p>7 Q Now, let me ask you -- and then we'll --</p> <p>8 we'll -- we'll go back to our other questions. Just</p> <p>9 now you said, "I would not allow any Chinese money to</p> <p>10 taint the organization."</p> <p>11 What did you mean by that?</p> <p>12 A You know, the Chinese have been buying off</p> <p>13 Washington and Wall Street so much recently, and to</p> <p>14 the extent that it's threatened our national</p> <p>15 security. And it has been so much a threat and I</p> <p>16 worry about -- you know, it's a -- actually, it's a</p> <p>17 joke among the Chinese that American poli- --</p> <p>18 politicians and people are cheap to buy, have many</p> <p>19 ways to buy. So I would guard it as a hawk.</p> <p>20 Well, since I was in the Rule of Law</p> <p>21 Society, particularly at -- I would guard Mr. Bannon,</p> <p>22 because Mr. Bannon's special connection was the</p> <p>23 White House. And I would watch it like a hawk, that</p> <p>24 the Chinese money should not taint his reputation.</p> <p>25 And I told Mr. Bannon, I said, "Don't take</p>
<p style="text-align: right;">Page 82</p> <p>1 A Because I don't know if that's -- the</p> <p>2 company's related to -- because he's ATA, that's</p> <p>3 go -- what goes to it, whatever. So I -- I have to</p> <p>4 understand it --</p> <p>5 Q Do you --</p> <p>6 A -- so I have question about it.</p> <p>7 Q Okay. Do you know whether -- well, let me</p> <p>8 ask you this. Do you know whether Mr. Je ever</p> <p>9 provided funding to the entity that you were a</p> <p>10 director of, Rule of Law Society?</p> <p>11 A I have no idea.</p> <p>12 Q Do you know whether he provided funding to</p> <p>13 Rule of Law Foundation?</p> <p>14 A I have no idea, as well.</p> <p>15 Q Okay. Now, are you familiar with an entity</p> <p>16 called "ACA"?</p> <p>17 A I read about it.</p> <p>18 Q But was ACA ever discussed in the context</p> <p>19 of William Je, when you were having talks about</p> <p>20 William Je?</p> <p>21 A I -- no. I only found out online. I --</p> <p>22 first, I was mistaken. I thought ACA was CA- -- CAA,</p> <p>23 which was the Sovereign Fund. I -- that's why I have</p> <p>24 problem.</p> <p>25 I would -- I would not -- well, I -- I</p>	<p style="text-align: right;">Page 84</p> <p>1 money from Mr. Guo. Not a penny of his money is</p> <p>2 clean, my understanding."</p> <p>3 Q Okay. Well, let me ask you now, do you</p> <p>4 know whether Mr. Bannon has taken money from Mr. Guo?</p> <p>5 A Only from the report that he took a million</p> <p>6 bucks, so I have no other personal knowledge.</p> <p>7 However, I know he use his private airplane and use</p> <p>8 his other -- his bodyguard and stuff like that.</p> <p>9 And I was joking to Mr. Bannon once, I said</p> <p>10 I would rather -- I always take a coach. I'm not</p> <p>11 going to -- coach to any of those because that taints</p> <p>12 your soul.</p> <p>13 Q I'm sorry, you're saying Mr. Bannon used</p> <p>14 Mr. Guo's private plane and bodyguards?</p> <p>15 A Yes. Mr. Guo told me that. And there's</p> <p>16 a -- there -- there is a photo online to show</p> <p>17 Mr. Bannon guarded by Mr. Guo's bodyguard.</p> <p>18 MS. CLINE: Objection; foundation.</p> <p>19 THE WITNESS: Mr. Guo's -- Mr. Guo's</p> <p>20 associate said that much on Twitter, said, "Look</p> <p>21 Mr. Bannon, look at Mr. Guo's bodyguard." So that is</p> <p>22 the foundation. I don't make it -- I just make the</p> <p>23 observation.</p> <p>24 MS. CLINE: I just repeat my evidentiary</p> <p>25 objection to the witness's testimony.</p>

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<p style="text-align: right;">Page 109</p> <p>1 Q (By Mr. Greim) Although he's offered things 2 to you, you've said? 3 MS. CLINE: Objection to form. 4 THE WITNESS: Yes. On air, that is. Even 5 privately and publicly. 6 Q (By Mr. Greim) Do you know whether Guo has 7 given money to any other journalist or media outlet? 8 A I have no knowledge. 9 Q Are you familiar with the entity -- or the 10 website "FollowCN.com"? 11 A "Follow CN"? 12 Q Yeah. It's the word "follow," capital C, 13 capital N, dot com. 14 A No. 15 Q Have you -- are you familiar with an entity 16 called "Guo Media"? 17 A Yes. 18 Q What is that? 19 A That was Guo's personal social media 20 platform. He's the only one speaking there. 21 Q Did Guo ever tell you who actually owned 22 it? 23 A No. Everybody assume he owned it. 24 Q Do you know of any of the PR firms or 25 agents that Guo has used?</p>	<p style="text-align: right;">Page 111</p> <p>1 A I was -- I serve as a director of C(4), so 2 am -- should -- am I obligated to keep that secret? 3 And this should be reported in -- in the 1099 -- or, 4 no, in the 990, right? 5 Q Well, let -- let me suggest this. If -- 6 you know, there is the opportunity to designate parts 7 of this transcript as "Confidential." 8 A Uh-huh. 9 Q I can't -- I'm not your lawyer, so I can't 10 advise you on what you can or cannot disclose. Can't 11 do that. But I can tell you that you will have the 12 opportunity to designate parts of this transcript 13 "confidential" under our protective order. 14 What I can't promise you is that the other 15 parties won't contest that, including -- including my 16 own client. And so all I can do is put the question 17 to you. 18 A I think, in that case, I -- I may decline 19 to answer that question because I have to consult 20 with people whether or not -- you know, I can call 21 Jennifer right away and see if I -- you know, if I 22 have the legal obligation to answer that question. 23 Q Is this the Jennifer -- 24 A Or conceal that question. 25 Q Is this the Jennifer Mercurio you spoke</p>
<p style="text-align: right;">Page 110</p> <p>1 MS. CLINE: Objection to form; foundation. 2 THE WITNESS: No. 3 Q (By Mr. Greim) Has Mr. Guo or one of his 4 entities given to Lianchao Han's organization? 5 A You mean, citizens -- (inaudible) -- 6 MS. CLINE: Objection. Oh, sorry. 7 THE WITNESS: According to Guo, yes, he 8 did. And Guo told me long time ago -- I don't know 9 what had happened -- he said he gave them 180,000. 10 And did he give them later -- I have no idea -- you 11 know, more money? I have no idea. 12 Q (By Mr. Greim) Did Mr. Guo tell you exactly 13 which of his entities gave \$180,000 to Mr. Han's 14 entity? 15 A No. I did not question. 16 Q Have you ever been given money by Mr. Han's 17 entity? 18 A No. And I gave them \$5,000 for a different 19 project last year. That was supposed to be a loan, 20 they just did not repay me. 21 Q Let me ask you about the Rule of Law 22 entities, a follow-up question. 23 Are you aware whether the Rule of Law 24 (c)(3) or (c)(4) has actually given money to any 25 group?</p>	<p style="text-align: right;">Page 112</p> <p>1 about earlier? 2 A Yes. 3 Q Did Ms. Mercurio caution you not to reveal 4 information from your time as a director? 5 A No, she did not, but I'm cautious on -- on 6 this. 7 Q Okay. Well, let me ask you this. Just 8 without naming names, has the (c)(3) or (c)(4) given 9 money to any U.S. dissidents? 10 MS. CLINE: She just -- she just testified 11 that she wants to refuse to answer the question. 12 THE WITNESS: Yeah. 13 Q (By Mr. Greim) Well, I actually asked for 14 the names of groups, not just asking -- 15 A Let me say, not to my knowledge. 16 Q Okay. Has -- has the (c)(3) or (c)(4) 17 given money to any dissidents of any kind? 18 A Not to my knowledge. 19 Q Has the (c)(4) undertaken any activities of 20 any kind? 21 MS. CLINE: Objection to form. 22 THE WITNESS: I can't -- I can't answer 23 that. 24 Q (By Mr. Greim) Is it because you -- you 25 don't know or because you believe it's confidential?</p>

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<p>1 A I do know, but I think it's confidential.</p> <p>2 MS. CLINE: Eddie, let me just put</p> <p>3 something on the record. You had asked a question a</p> <p>4 moment ago about something that a lawyer and Ms. Wang</p> <p>5 (sic) spoke about, and she actually answered the</p> <p>6 question.</p> <p>7 So just for the record, Ms. Wang's not</p> <p>8 represented by counsel, the Rule of Law Society has</p> <p>9 no counsel here, so I just don't want there to be</p> <p>10 a -- an argument later that the fact that she</p> <p>11 answered that question is some sort of subject matter</p> <p>12 waiver.</p> <p>13 MR. GREIM: No. We -- we don't believe</p> <p>14 that that's true and, frankly, I don't believe that</p> <p>15 my question called for any privileged discussion.</p> <p>16 My question was about whether you'd</p> <p>17 received any directives, and we don't view that as</p> <p>18 disclosure of any privileged information, and we</p> <p>19 certainly don't view it as a waiver. We believe that</p> <p>20 any privilege there is completely intact.</p> <p>21 THE WITNESS: Yeah, here's what -- my</p> <p>22 understanding is that I'm no longer a -- a member, so</p> <p>23 I'm -- she's not representing me.</p> <p>24 MS. CLINE: I -- I under- -- understand.</p> <p>25 There's just a -- Eddie and I can have a fight later</p>	<p>1 only, you know, thing. But I have two sources I can</p> <p>2 state. One source I would not state.</p> <p>3 MS. CLINE: Again --</p> <p>4 MR. GREIM: Well --</p> <p>5 MS. CLINE: -- same -- same objections I've</p> <p>6 been raising all day.</p> <p>7 Q (By Mr. Greim) And, you know, the other</p> <p>8 thing -- I'll just tell you that there are two</p> <p>9 purposes for a deposition. You know, one is to</p> <p>10 obtain testimony that will itself be admissible.</p> <p>11 Another purpose is to learn information from which we</p> <p>12 can try to find things that will be admissible.</p> <p>13 And -- and so some things you are telling</p> <p>14 us here are -- you've made clear are based on your</p> <p>15 review of other sources. Some things are based on</p> <p>16 things that the individuals involved have told you.</p> <p>17 So we'll just try to make clear. And I</p> <p>18 thank you for making clear where that information</p> <p>19 came from.</p> <p>20 A I would make that distinction --</p> <p>21 Q Okay.</p> <p>22 A -- clearly, what I -- personal knowledge</p> <p>23 and secondhand knowledge.</p> <p>24 Q Very good.</p> <p>25 Did you ever talk with Mr. Guo about</p>
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<p>1 about whether you're permitted to answer those</p> <p>2 questions, but I just don't want anybody who's not</p> <p>3 here to be waiving a privilege.</p> <p>4 MR. GREIM: That's right. And, frankly, I</p> <p>5 mean, I -- I don't think we need to delve any further</p> <p>6 into that topic.</p> <p>7 Q (By Mr. Greim) Okay. Let me -- I'm going</p> <p>8 to go through and ask you about a few individuals, to</p> <p>9 the extent that I haven't already done this before.</p> <p>10 First of all, I think you testified that</p> <p>11 you had met Yon Ping (phonetic) or Yvette Wang?</p> <p>12 A Yes.</p> <p>13 Q How many times have you met her?</p> <p>14 A Perhaps two or three times. I don't recall</p> <p>15 that much.</p> <p>16 Q Have you -- did you have any opportunity to</p> <p>17 discuss her background with -- with her?</p> <p>18 A No. However, as a reporter, I went to</p> <p>19 check the Chinese site, and I believe she's a</p> <p>20 graduate from the Liu Yung (phonetic) PLA Information</p> <p>21 Technology. Now it's called the People's Republican</p> <p>22 Army's Information Technology -- Information some --</p> <p>23 Engineering University.</p> <p>24 I only have two sources as a reporter, and</p> <p>25 I can't testify to truth of that. And that's the</p>	<p>1 Ms. Wang's background?</p> <p>2 A No.</p> <p>3 Q Did you ever talk with Ms. -- Mr. Guo or</p> <p>4 Ms. Wang about whether she was still a member of the</p> <p>5 Chinese Communist Party?</p> <p>6 A I never talk to them. Ms. Wang said that</p> <p>7 much herself in an interview, so it's a public --</p> <p>8 it's public knowledge. She said she was the party --</p> <p>9 that's in 2017. She said she's a -- she was a party</p> <p>10 member for 17 years, she was still a loyal party</p> <p>11 member, at least as to -- as to 2017.</p> <p>12 Q Do you know -- do you know when this</p> <p>13 interview was in 2017?</p> <p>14 A I think it's later part of 2017, somewhere</p> <p>15 in September, November, that -- that time frame.</p> <p>16 Q Who was the interview with?</p> <p>17 A The Mirror -- the Mirror host,</p> <p>18 Chen Xiaoping. Last name C-h-e-n, first name</p> <p>19 Xiaoping, X-i-a-o-p-i-n-g.</p> <p>20 Q Did you witness Ms. Wang acting in any role</p> <p>21 with Guo other than as his assistant?</p> <p>22 MS. CLINE: Objection to form.</p> <p>23 THE WITNESS: No.</p> <p>24 Q (By Mr. Greim) Let me ask you maybe one or</p> <p>25 two more questions about Han Chunguang. Did you ever</p>

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<p>1 converse with him?</p> <p>2 A No.</p> <p>3 Q Did you ever hear him speak?</p> <p>4 A Just a few words.</p> <p>5 Q And what language was he speaking?</p> <p>6 A Northern dialect.</p> <p>7 Q Okay. I'm sorry, is that -- is that</p> <p>8 Mandarin?</p> <p>9 A Mandarin, yes.</p> <p>10 Q And you're familiar with Mandarin speakers?</p> <p>11 A Yes. I actually speak four dialects.</p> <p>12 Q Okay. Well, what -- what are those four</p> <p>13 dialects?</p> <p>14 A Oh, I speak -- I -- Cantonese, Mandarin,</p> <p>15 Toisanese and Hunanese.</p> <p>16 Q All right. And could -- could you draw any</p> <p>17 conclusions about Mr. Han's level of education by</p> <p>18 hearing his speaking of Mandarin?</p> <p>19 MS. CLINE: Objection; foundation. You're</p> <p>20 not qualifying her as an expert.</p> <p>21 THE WITNESS: I think -- well -- well, I --</p> <p>22 as a standard Mandarin speaker, reporter, and a</p> <p>23 teacher, I guess his education sounds like he -- he</p> <p>24 does not have the high school certificate kind.</p> <p>25 Q (By Mr. Greim) I'm sorry, what -- what --</p>	<p>1 Mr. Guo?</p> <p>2 A No.</p> <p>3 Q Have you ever been present with Mr. Guo and</p> <p>4 Mr. Bass together?</p> <p>5 A No.</p> <p>6 Q Have you ever been to an office where</p> <p>7 Mr. Guo works, aside from his apartment?</p> <p>8 A Yes.</p> <p>9 Q Where was that?</p> <p>10 A It's somewhere in -- 5th Avenue and 62</p> <p>11 and -- someplace like that. It's a six-split-story</p> <p>12 building, very modern building.</p> <p>13 Q Okay. Was that 162 East 64th Street?</p> <p>14 A I can't testify for the address, I just</p> <p>15 went there.</p> <p>16 Q Was that -- did that appear to be the</p> <p>17 office of an entity with "Golden Spring" in the name?</p> <p>18 MS. CLINE: Objection.</p> <p>19 THE WITNESS: I don't know. I know that</p> <p>20 Guo's broadcasting studio is there.</p> <p>21 Q (By Mr. Greim) Okay. Did -- did you see</p> <p>22 where Guo's office was in that building?</p> <p>23 A Yes.</p> <p>24 Q Where was it?</p> <p>25 A You know, that's the building. I think</p>
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<p>1 what do you mean by that?</p> <p>2 A Not very well educated.</p> <p>3 Q Would you be surprised to hear that he ran</p> <p>4 an investment or a media company?</p> <p>5 A No. No way.</p> <p>6 MS. CLINE: Objection to form.</p> <p>7 THE WITNESS: So -- so -- all right. I</p> <p>8 have no knowledge and -- but I'd be surprised.</p> <p>9 Q (By Mr. Greim) Okay.</p> <p>10 A So why would someone who ran an investment</p> <p>11 firm to -- to serve as a cook?</p> <p>12 Q All right. Let's --</p> <p>13 A That's my journalistic question.</p> <p>14 Q Okay. Well, remember, we are asking you</p> <p>15 the questions here, Ms. Gong.</p> <p>16 A All right.</p> <p>17 Q Okay. Have you ever met someone named</p> <p>18 J. Kyle Bass?</p> <p>19 A No.</p> <p>20 Q Do you know his role with Guo?</p> <p>21 A Yes.</p> <p>22 Q What is it?</p> <p>23 A He is the -- he is the chairman of the</p> <p>24 Rule of Law (c)(3).</p> <p>25 Q And have you ever discussed Mr. Bass with</p>	<p>1 that Guo's office was on the top floor.</p> <p>2 Q Who else has an office there?</p> <p>3 MS. CLINE: Objection; foundation,</p> <p>4 relevance.</p> <p>5 THE WITNESS: Yeah. The foundation, here</p> <p>6 is that. Guo told me that was also the -- the -- the</p> <p>7 office of the Rule of Law Society and Rule of Law</p> <p>8 Foundation. And he told me, if you come to work</p> <p>9 here, you have an office here.</p> <p>10 And he also pointed out an office or so,</p> <p>11 you know, on the top floors, that was Mr. Bannon's</p> <p>12 office. And there was a kitchen and there was some</p> <p>13 other offices, but I have no idea what other entity</p> <p>14 was there besides the Guo Media.</p> <p>15 Q (By Mr. Greim) Did you see the Guo Media</p> <p>16 setup within this building?</p> <p>17 A Yes. I actually help him to -- you know,</p> <p>18 to -- to straighten up some broadcasting equipment.</p> <p>19 And his people sent me a budget for \$2 million to</p> <p>20 build a studio.</p> <p>21 I thought it was nuts because the whole</p> <p>22 studio design and thing for that space -- at first,</p> <p>23 it was designed wrong. And the -- and then the</p> <p>24 two -- well, I decided, with everything together, it</p> <p>25 would not exceed 150,000.</p>

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<p>1 Q And so you did not begin to become 2 concerned until November of 2018? 3 A I began to -- I began to be more concerned 4 of Mr. Bannon after November 20. Before that I had a 5 lot of concern, but my concern focus on, you know, 6 how the Chinese -- Chinese government infiltrate in 7 Amer- -- in the United States and all that, because 8 it's -- I don't think we have time to discuss all the 9 details, but I have -- I was very, very concerned. 10 Q Well, you -- when did you accept the -- a 11 directorship on Rule of Law Society? 12 A July 2018. 13 Q And that is over a year after you first met 14 Mr. Guo? 15 A Yes. 16 Q And your training as an investigative 17 journalist in that entire year did not raise enough 18 concerns to you for you to decline the invitation to 19 serve as a director? 20 A The reason is that Mr. Bannon wants to do 21 that. And a couple of people in the CPDC talk to me 22 and told me to somewhat, you know, watch over 23 Mr. Bannon. 24 So Mr. Bannon personally invited me in to 25 the four- -- to the -- the Board. And later he said</p>	<p>1 case -- following every case. I had my concern 2 and -- to check all the details, but -- well, the 3 Rule of Law Foundation, because of Mr. Bannon's 4 involvement, I thought I was obligated to help out. 5 Q So, in other words -- 6 A (Inaudible). 7 Q Okay. But you still advised Mr. Guo on 8 things like the Guo Media setup and -- and other 9 things after you had conducted the initial interviews 10 with Mr. Guo? 11 A Yes. 12 Q And you still did another interview with 13 Mr. Guo an entire year later, in April 2018, correct? 14 A Yes. 15 Q So you were not so concerned with him yet 16 that you were prepared to deny him a platform to 17 speak? 18 A No. That's somebody else platform. If you 19 listen to that inter- -- that interview is a 20 four-hour interview. You could hear -- I grill him 21 on those details, what I concern. 22 The Mr. Liu Zhihua's (phonetic) case, as I 23 said, Mr. Jianhua (phonetic), he try to, you know, go 24 around and -- that was my concern. 25 You can clearly hear I want to know what</p>
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<p>1 he could not function without me being there. 2 Q Now, wait. Let me stop you. 3 A Uh-huh. 4 Q We're -- we're -- we're switching around 5 here. 6 A Uh-huh. 7 Q Let's go ahead and finish this, and then I 8 want to come back to my other question. 9 So what is -- which -- which Board is it 10 that Mr. Bannon invited you to be a part of? 11 A (c)4. 12 Q The (c)4. Rule of Law Society? 13 A Yes. 14 Q Okay. Okay. Thank you. 15 And did Mr. Bannon explain to you why he 16 think -- thought he needed to rely upon you in the 17 Rule of Law Society? 18 A Because I'm the only one there who speaks 19 both language fluently, who understand the situation. 20 Q Okay. I guess my question to you is: Why 21 did it take you at least a year from your first 22 meeting with Mr. Guo to begin to have concerns about 23 him? 24 A I had concern before, so that's why I have 25 all the documents and check and everything and every</p>	<p>1 the Chinese intelligence -- how the Chinese 2 intelligence works through him and they work with him 3 and what he knew about the operation of the Chinese 4 intelligence and the corrupted officials. 5 Q Let me ask you, I mean, did Mr. Guo -- has 6 he told you pointblank that he is no longer working 7 with the Chinese intelligence? 8 MS. CLINE: Objection to form. 9 THE WITNESS: No. And on the contrary, he 10 talk all the time about his close connection with 11 the -- the high-ranking leaders and the Chinese and 12 this or that. And he -- he -- actually, he's very 13 proud in public of his maintaining connections with 14 people -- the leaders -- the Chinese Comm- -- 15 Communist Party inside China. 16 Q (By Mr. Greim) Well, when is the last time 17 that Mr. Guo said to you that he was in contact with 18 high-ranking officials within China? 19 A Well, it's not to me. He -- actually, just 20 weeks ago he broadcast it out. I haven't paid that 21 much attention his -- to his recent broadcasting, but 22 I know he talk about it on air. 23 Q Okay. Let me ask you about -- you 24 mentioned an entity, CPDC. What is that? 25 A The Committee for Present Dang- --</p>

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<p style="text-align: right;">Page 133</p> <p>1 Committee for Present Danger China, which is a group 2 of China hawks. And so they organize and they focus 3 on -- I should say "we," because I'm a member -- 4 focus on, you know, pushing the U.S. -- U.S./China 5 policy certain way. So this is a group of the China 6 hawks.</p> <p>7 Q Okay. And you're a member of that, I think 8 you've said?</p> <p>9 A Yes.</p> <p>10 Q Were you -- who -- is Mr. Bannon a member?</p> <p>11 A Mr. Bannon's -- well, I'm a founding member 12 and then Mr. Bannon's a founding member as well.</p> <p>13 Q Is Mr. Waller a member of it?</p> <p>14 A Mr. Waller is a member, yes.</p> <p>15 Q Is Ms. Wallop?</p> <p>16 A I don't remember, because the list keep 17 expanding.</p> <p>18 Q Okay. Has Mr. Bannon tried to raise money 19 for CPDC?</p> <p>20 A Well, I don't -- I don't think he made any 21 attempt, or so I heard -- I don't remember where I 22 heard he told people that Bannon has more money than 23 God -- or, no, Guo has more money than God and he 24 can -- something. But people's impressions that, 25 with Steve Bannon there, money would not be a big</p>	<p style="text-align: right;">Page 135</p> <p>1 broadcast for four -- for three hours and that there 2 are 4 million VPN. Each VPN have ten people behind, 3 so 40 million people are listening.</p> <p>4 I said -- well, mostly my experience. Most 5 of those VPNs are tech VPNs. So they call it denied 6 service, the VPN. So, like, if you broadcast, they 7 get into you a few second each, a few second each, so 8 other people try to get -- get on and they have 9 trouble. So 4 million -- and other entities also 10 report millions of VPN attacks to deny service.</p> <p>11 So it's not -- it's -- it's wrong if you 12 expect the Chinese attack you and -- the VPNs would 13 not be -- you know, 4 million VPN may be just, like, 14 100 VPN attack you. It should attack you 100,000 15 times and deny other people service. It's not 40 -- 16 does not represent 40 million listeners.</p> <p>17 Q I'm -- okay.</p> <p>18 MS. CLINE: Objection; foundation.</p> <p>19 MR. GREIM: Okay. And --</p> <p>20 THE WITNESS: The foundation is that I -- I 21 do know this. I'm a broadcaster.</p> <p>22 Q (By Mr. Greim) So -- so -- but -- but 23 here's my question. Is this something that -- this 24 is in context of you talking to Bannon and giving -- 25 and giving him concerns, correct?</p>
<p style="text-align: right;">Page 134</p> <p>1 issue.</p> <p>2 Q Has any member of the CPDC expressed 3 concern to you about Mr. Guo?</p> <p>4 A Yes.</p> <p>5 Q Who?</p> <p>6 A I think I don't want to disclose the 7 private conversation, and I -- without their 8 permission.</p> <p>9 Q Okay. Well, don't disclose the identity 10 then, but what did the -- what was the concern that 11 this person expressed?</p> <p>12 A This -- not -- I don't mean this person, I 13 mean, these pers- -- peop -- persons. And they 14 believe Guo is a bad person and a liar. And that 15 they -- they have concern of Mr. Bannon's connection 16 with Mr. Guo. And one of them even asked me to watch 17 over and then talk to Bannon.</p> <p>18 Q Did you do that?</p> <p>19 A Yes, I did.</p> <p>20 Q And what did you tell Mr. Bannon?</p> <p>21 A Several things. First, about Guo Media, I 22 told Mr. Bannon Guo's number -- Guo always claimed 23 there are millions of people listening to his 24 broadcast. I said, "It's not true." 25 And say Guo would show, hey, today we</p>	<p style="text-align: right;">Page 136</p> <p>1 A Yes.</p> <p>2 Q Okay. And what Guo had said is that lots 3 of people are listening to Guo Media?</p> <p>4 A Right.</p> <p>5 Q Is that right?</p> <p>6 A Uh-huh.</p> <p>7 Q And if I understand your testimony, you 8 tried to explain to Mr. Bannon that, because of this 9 VPN issue, that, in fact, not as many people were 10 probably listening to Guo Media as Guo suggested.</p> <p>11 A Right. I said the normal calculation at -- 12 in my experience, is that if you have, say, 10,000 13 people -- if you have 10,000 people on your -- on 14 YouTube, and then your -- your own V- -- your own 15 platform might be, like, 20 percent to 30 percent of 16 that.</p> <p>17 Q Okay.</p> <p>18 A That's my experience.</p> <p>19 Q Okay. What else did you tell Mr. Bannon?</p> <p>20 A And I told him he should not participate in 21 Guo's showing off wealth sessions, like drinking -- 22 not drinking -- smoking cigar -- cigar and all that. 23 I said, "The Chinese -- actually, the Chinese people 24 despise that." 25 Well, this -- I said, none -- none of</p>

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<p>1 MS. CLINE: Objection to form; foundation.</p> <p>2 THE WITNESS: Huge impact because people</p> <p>3 were afraid of being sued and people were afraid of,</p> <p>4 you know, any -- because Mr. Guo launch attack to</p> <p>5 different dissidents a lot.</p> <p>6 Whenever he attacked -- you know, a</p> <p>7 lawsuit -- these people, you know, they left their</p> <p>8 country, they left -- they -- they have problem of</p> <p>9 paying legal fee, and they're very afraid.</p> <p>10 So the Chinese community actually developed</p> <p>11 a term called "Teflon." Teflon's because Guo's</p> <p>12 name -- the word "Guo" in Chinese sounds like a pot</p> <p>13 or a pan.</p> <p>14 So -- and you talk to people, said, "Hey,</p> <p>15 have you heard of this?" So I'm Teflon, means I</p> <p>16 don't even want you touch -- touch the subject.</p> <p>17 The problem is that Guo have touched so</p> <p>18 many tough subjects. Hong Kong mainland and the --</p> <p>19 and the intelligence office and Chinese espionage.</p> <p>20 The dissident community used to discuss the</p> <p>21 subject a lot. Now they afraid to even touch the</p> <p>22 subject.</p> <p>23 For example, we all know Guo works very</p> <p>24 closely with the Chinese intelligence. Say Chinese</p> <p>25 intelligence had Ma Jian -- last name M-a, J- --</p>	<p>1 Guo retaliating against any dissident?</p> <p>2 MS. CLINE: Objection to form.</p> <p>3 THE WITNESS: How about to me?</p> <p>4 Q (By Mr. Greim) Okay. How about to you.</p> <p>5 Tell --</p> <p>6 A Yes.</p> <p>7 Q Tell us about that.</p> <p>8 A And this is very peculiar. I never have a</p> <p>9 bad relationship with Guo and I was okay with him</p> <p>10 until, you know, I was -- I -- you know, in the past</p> <p>11 year I was making a movie -- and Mr. Bannon also</p> <p>12 participate in it -- on the dissident movement in</p> <p>13 former Soviet Union and Eastern Europe and China. So</p> <p>14 that's a -- a whole docuseries on dissident</p> <p>15 movements.</p> <p>16 And I didn't tell Guo much about it until I</p> <p>17 came back from Europe. I came back from Europe, I</p> <p>18 gave him a call. I said, "Hey, I came back, I did a</p> <p>19 lot of interviews, I'm making a movie on this."</p> <p>20 And so --</p> <p>21 Q What was Guo's response?</p> <p>22 A Just -- well, he would say, "Oh, yeah,"</p> <p>23 just like, "good" and whatever.</p> <p>24 But later I -- I -- I interviewed the</p> <p>25 former KGB counterint- -- the head of</p>
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<p>1 first name J-i-a-n -- who was accused of -- you know,</p> <p>2 who was sentenced to life in prison for taking Guo's</p> <p>3 money.</p> <p>4 And, normally -- normally, the Chinese</p> <p>5 media, Chinese dissidents would focus on that, say,</p> <p>6 hey, how corruption, and what's the -- international</p> <p>7 corruption, how the -- you know, the espionage and</p> <p>8 how they infiltrated.</p> <p>9 Nobody dare to touch it now because if you</p> <p>10 touch it, Guo would say, "Hey, you are attacking my</p> <p>11 buddy Ma Jian." So he would make up a lot of stories</p> <p>12 like he make up stories on me.</p> <p>13 I am this -- I have to express my personal</p> <p>14 opinion. I am mad as hell.</p> <p>15 Q Okay. Okay.</p> <p>16 MS. CLINE: And, Ed -- before you clean</p> <p>17 that up, Eddie, again, I just register my objection</p> <p>18 to this type of testimony when personal knowledge is</p> <p>19 interspersed with opinion is interspersed with what's</p> <p>20 reported and -- and -- and hearsay and so forth, so</p> <p>21 we object and we'd move to strike.</p> <p>22 THE WITNESS: Can I talk about my personal</p> <p>23 knowledge then?</p> <p>24 Q (By Mr. Greim) Yes. That was -- my next</p> <p>25 question is: Do you have any personal knowledge of</p>	<p>1 counterintelligence, which means intelligence,</p> <p>2 Oleg Kalugin, Mr. Kalugin, who defected to the states</p> <p>3 25 years ago. So I'm happy to clear (phonetic) out</p> <p>4 is that I just interviewed a KGB guy.</p> <p>5 Suddenly, Guo made a broadcast -- made a --</p> <p>6 made up a story, said I went -- I drove from Italy</p> <p>7 to -- to Russia and to meet with the -- with the top</p> <p>8 Chinese intelligence and the KGB guys. Then I took</p> <p>9 \$10 million from the Chinese to separate him from</p> <p>10 Mr. Bannon.</p> <p>11 I said, "Hey, first, the interview was -- I</p> <p>12 did not say that" --</p> <p>13 Q Let -- let -- let -- let me stop you for a</p> <p>14 second. So those are allegations that Guo publicly</p> <p>15 made about you?</p> <p>16 A Yes.</p> <p>17 Q Okay.</p> <p>18 A Yes. And he -- he said, you know, I was</p> <p>19 bought out and to separate -- separate him from</p> <p>20 Mr. Bannon. I -- I don't know Mr. -- what Mr. Bannon</p> <p>21 said to Guo. And --</p> <p>22 Q Are those allegations true?</p> <p>23 A Of course not. Of course not. I -- you</p> <p>24 know, I can show you my passport and the U.S. border</p> <p>25 records and the -- the strange thing is that</p>

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<p>1 Mr. Bannon actually knew where I was in Europe. 2 And I came back from Europe, two months 3 later I interview with the KGB guy. Never left the 4 country. And while -- the strange -- very, very 5 strange thing, you know, the story he made up was -- 6 he said, you know, I took \$10 million. 7 How the hell I took 10 mil- -- I thought 8 Mr. Bannon, with his current condition, if you want 9 to separate Guo, somebody paid him \$10 million, he 10 would take it. 11 Well, I don't know if he would take it, but 12 that's -- you know, that's what I thought. 13 Q Did you ever talk directly with -- have you 14 spoken directly with Guo after he made this 15 allegation against you? 16 A Of course not. 17 Q Okay. 18 A I was mad as hell. And -- would you? 19 Would you be mad as hell to ex- -- face (phonetic) a 20 liar like that? Of course you will. If I tell -- 21 you know, make up all the story, of course I was mad 22 as hell. 23 And how could someone say -- you know, a 24 friend, to make up a story like that and to say that 25 to the whole world.</p>	<p>1 Of course, I'm mad as hell. I don't want to talk to 2 him anymore. 3 Q Okay. Have you heard or have you witnessed 4 Guo make similar accusations against other 5 dissidents? 6 MS. CLINE: Objection to form. 7 THE WITNESS: Once he made accusations 8 a lot in his broadcasting, and -- but, you know, 9 because I did -- this thing is -- I personally 10 involved. And also they made up another lie to -- 11 against me. 12 And Mr. Guo said, "We have a lawsuit. We 13 apply for" -- Mr. Guo said I swindle all the money 14 because we -- our lawyer is free. 15 Q (By Mr. Greim) Hold on. Hold on. Wait a 16 second. This is a separate statement Mr. Guo has 17 made? 18 A Yes. 19 Q Okay. And what was -- was the statement 20 about you? 21 A About our legal fee because we apply for 22 that -- some help from the Rule of Law -- 23 Q I see. Okay. So he was -- the statement 24 was about your -- 25 A Legal fee.</p>
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<p>1 I did not respond because I thought that 2 was beyond my -- beyond, you know, my integrity to 3 respond to something so ridiculous, but that's how he 4 made up. So I -- of course, I began to review and -- 5 you know, other things he said. That is something I 6 know. 7 And he -- it's very, very -- it's -- and 8 also Mr. Bannon. Mr. Bannon knows, and I wrote him 9 and wrote him frequently when -- in my -- when I was 10 traveling in Europe, "I'm here today, I'm in the 11 solidarity," I'm something. 12 And eventually he said, "Would you want to 13 see Trisulti in Italy?" 14 Q This is something Mr. Bannon said to you? 15 A Yes, e-mail. 16 Q Okay. 17 A And he said, "Well" -- I said, "Okay. I 18 would love to." So I actually spend my own money and 19 went to Mr. Bannon's gladiator school for two days 20 and came back right to the United States -- 21 Q Okay. 22 A -- of America. 23 Q Very good. 24 A Mr. Bannon knows that. And I -- I'm 25 supposed to be his friend? He does not defend me?</p>	<p>1 Q -- legal fees in your Voice of America 2 lawsuit? 3 A Yes. 4 Q Okay. What was the statement? 5 A He -- the statement he -- he and his trolls 6 (phonetic) said I have no legal fee, I raised all the 7 money and took all the money myself. 8 Q I see. 9 A And the -- the funniest thing is that the 10 two -- two directors of -- of Guo's trow (phonetic) 11 at -- in the Rule of Law Foundation knew about -- you 12 know, in the board meeting I submitted all the 13 legal -- legal bills, and the -- the lawyer of the 14 Rule of Law Foundation know about it. 15 So the other thing -- why I was so angry 16 was Jennifer is, "Jennifer, do you know about it?" 17 Jennifer said -- 18 MS. CLINE: Hang on. Hang on. I'm 19 concerned about privilege if she's talking to a 20 lawyer. 21 Q (By Mr. Greim) Well, was this statement 22 aft- -- 23 A That's not my lawyer. 24 Q Was this statement after you have left the 25 Rule of Law Society?</p>

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<p>1 million dollars --</p> <p>2 Q (By Mr. Greim) Is -- I'm sorry, is this the</p> <p>3 Guo --</p> <p>4 A Guo --</p> <p>5 Q I'm sorry, the Bannon --</p> <p>6 A -- Bannon. Bannon took a million dollars</p> <p>7 from Eastern -- Eastern Profit?</p> <p>8 Q Now, Ms. Gong, please, just -- just</p> <p>9 answer -- answer the --</p> <p>10 A Yes.</p> <p>11 Q Let's -- let's do question and answer. So</p> <p>12 my question to you is -- well, let -- let's go back.</p> <p>13 So my question was actually whether</p> <p>14 Mr. Guo's public interaction with members of the</p> <p>15 China hawk community have any effect on, let's say,</p> <p>16 the credibility of U.S. China hawks.</p> <p>17 MS. CLINE: Objection to form; foundation.</p> <p>18 THE WITNESS: A lot. And he make them look</p> <p>19 unreasonable, ridiculous, and base so much of the</p> <p>20 policy opinion on rumors.</p> <p>21 Q (By Mr. Greim) Do you know whether Mr. Guo</p> <p>22 has attempted to make payments or contributions or</p> <p>23 loans to members of the China hawk community?</p> <p>24 MS. CLINE: Objection to form.</p> <p>25 THE WITNESS: I only know he paid</p>	<p>1 Q (By Mr. Greim) Do you think that the risk</p> <p>2 of placing regular phone calls over open cell lines</p> <p>3 to the mainland is known to politically active</p> <p>4 Chinese dissidents in the U.S.?</p> <p>5 MS. CLINE: Objection; form, foundation.</p> <p>6 THE WITNESS: You mean, the risk?</p> <p>7 Q (By Mr. Greim) Yes.</p> <p>8 A Yes, everybody knows that, so we are all</p> <p>9 trying to minimize our contact with China.</p> <p>10 Q Or do you try to use encrypted services</p> <p>11 like WhatsApp or Signal?</p> <p>12 A The Chinese blocked WhatsApp -- WhatsApp</p> <p>13 and Signal, so unless you can, you know, find a way</p> <p>14 to cross the great firewall, Whats and Signal and</p> <p>15 Google and -- none of this works.</p> <p>16 MR. GREIM: I am now -- oh. I'm going to</p> <p>17 play -- the final few questions. I'm going to play</p> <p>18 for you a few clips that I -- I doubt you've heard</p> <p>19 before, but I'll ask you. I'll play for you a few</p> <p>20 clips. I'm going to see if you recognize the voices</p> <p>21 on these.</p> <p>22 And I'll -- I'll represent that the very</p> <p>23 first clip is what we have previously produced and</p> <p>24 played, and we've produced a transcription, as</p> <p>25 Video 1.</p>
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<p>1 Mr. Bannon and later learned pay Mr. -- Mr. Gertz and</p> <p>2 other people I don't.</p> <p>3 Q (By Mr. Greim) Okay. I just have a few</p> <p>4 questions left for you here.</p> <p>5 So, Ms. Gong, you -- do you still stay in</p> <p>6 touch with individuals living in China?</p> <p>7 A Not much because I'm afraid, you know, they</p> <p>8 might be -- they might be tainted in a way.</p> <p>9 Q And does someone living in the U.S. who is</p> <p>10 a high-profile dissident opposing the CCP face risks</p> <p>11 of surveillance if they make regular phone calls over</p> <p>12 open cell phone lines to the mainland?</p> <p>13 MS. CLINE: Objection to form; lacks</p> <p>14 foundation.</p> <p>15 THE WITNESS: Of course, because I don't</p> <p>16 even call my family that much, being afraid of, you</p> <p>17 know, the -- the -- the secret police going after</p> <p>18 them.</p> <p>19 Q (By Mr. Greim) And what about -- are there</p> <p>20 also risks in calling Hong Kong phone numbers?</p> <p>21 MS. CLINE: Objection; foundation.</p> <p>22 THE WITNESS: Well, Hong Kong, I don't</p> <p>23 think -- well -- well, not now. Now I -- you know,</p> <p>24 in the new Internet age and in the surveillance age,</p> <p>25 I think people are afraid.</p>	<p>1 What I'm going to do is I'm going to turn</p> <p>2 my laptop around and I'm going to play it for you.</p> <p>3 THE WITNESS: Uh-huh.</p> <p>4 Q (By Mr. Greim) This is in Chinese. I'm</p> <p>5 going to try to do it so that opposing counsel can</p> <p>6 hear it, too, and -- and see what's on my screen. I</p> <p>7 know it may not be as bright as it could be.</p> <p>8 MS. CLINE: So I just -- this may have been</p> <p>9 sorted out before I got involved in the case, but I</p> <p>10 have no idea what Video 1 is and whether it's been</p> <p>11 authenticated, but, I mean, I'll allow you to --</p> <p>12 MR. GREIM: Well, right. That's one --</p> <p>13 MS. CLINE: -- ask the question.</p> <p>14 MR. GREIM: That's one reason we're going</p> <p>15 to do it. So this has been produced -- you remember</p> <p>16 we produced a binder to the Court of different</p> <p>17 trans- -- translations? This was since you've been</p> <p>18 in the case, I -- I believe. And so this is the very</p> <p>19 first of those. It's a three-minute clip and it just</p> <p>20 appears online.</p> <p>21 MS. CLINE: Online where?</p> <p>22 MR. GREIM: Here, let me pause so that we</p> <p>23 don't get too far. You know what? I've got -- on</p> <p>24 the translation, we have the -- we have the string</p> <p>25 that you can find it on. I actually don't have it</p>

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<p style="text-align: right;">Page 161</p> <p>1 here. This is just a file that I have on my computer</p> <p>2 that I'm going to play.</p> <p>3 So I will -- I will just simply make a</p> <p>4 record that this is Video 1, and then we will -- we</p> <p>5 will send Video 1, this very clip that we're playing,</p> <p>6 so that it's part of this record.</p> <p>7 And then I'll refer to you -- you'll be</p> <p>8 able to see that -- you know, what the exact address</p> <p>9 is for Video 1 where you can pull it up off the</p> <p>10 Internet.</p> <p>11 So let me go back to the beginning because</p> <p>12 it just starts right off the bat. Make sure it's --</p> <p>13 the volume is going. I don't know if I've got it or</p> <p>14 not.</p> <p>15 (Counsel is playing Video 1 for witness.)</p> <p>16 Q (By Mr. Greim) All right.</p> <p>17 A That's Guo, that's for sure.</p> <p>18 Q No. Hold on. Let me -- let me ask you</p> <p>19 this as questions.</p> <p>20 First of all, you've spoken with Guo in</p> <p>21 person many times, correct?</p> <p>22 A Yes.</p> <p>23 Q And you've heard his voice on prior</p> <p>24 recordings on the Internet?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 163</p> <p>1 of Guo's closest -- it's somebody with the status</p> <p>2 of -- Yvette Wang left him and took a lot of tapes</p> <p>3 and something, you know, back to China. So later</p> <p>4 they placed some online, including -- I only saw a</p> <p>5 few. It's sort of a -- not -- but I never heard of</p> <p>6 them.</p> <p>7 That's RPLRG's tape?</p> <p>8 Q Well, I just want to ask you this. I want</p> <p>9 to -- has -- have you heard anyone say that RP- --</p> <p>10 well, let me ask you this.</p> <p>11 Have you heard Guo say that RPLRG is a</p> <p>12 channel associated with the Chinese Communist Party?</p> <p>13 A I don't recall. It's something I -- I</p> <p>14 think, you know, I have to scratch my memory, is that</p> <p>15 I don't recall he said to me personally, but I recall</p> <p>16 some events like that.</p> <p>17 Q Okay. I'm going to show you one more clip.</p> <p>18 This one is a little bit longer, but this is -- and</p> <p>19 this is the last one here.</p> <p>20 What I'm going to show now is what we have</p> <p>21 previously produced -- and I think this will be more</p> <p>22 familiar to you -- as Video 4. It has been</p> <p>23 transcribed and -- and we've played it with a few</p> <p>24 other witnesses.</p> <p>25 MS. CLINE: Yeah, and I'm just -- again,</p>
<p style="text-align: right;">Page 162</p> <p>1 Q And my question to you is: Is the voice</p> <p>2 that we just heard the voice of Guo?</p> <p>3 MS. CLINE: I'm just going to -- I'm going</p> <p>4 to lodge an objection. Again, I don't know if this</p> <p>5 is appropriate for lay witness testimony. Obviously,</p> <p>6 I'll let you ask the question, but I'm objecting.</p> <p>7 MR. GREIM: Your objection is preserved.</p> <p>8 THE WITNESS: That is him.</p> <p>9 Q (By Mr. Greim) Okay.</p> <p>10 A And not only the voice, but the way he</p> <p>11 speaks. He has a very distinguished way to speak.</p> <p>12 And, actually, you can find similar tapes</p> <p>13 with the same contents, and he send it out. But this</p> <p>14 one I've -- I -- I never heard it before. And -- but</p> <p>15 he pledge allegiance to the Chinese many times and</p> <p>16 that's one very clearly. The -- the way the</p> <p>17 colloq- -- the colloquium he used, very, very</p> <p>18 specific.</p> <p>19 Q (By Mr. Greim) Now, have you heard of a</p> <p>20 YouTube channel that is -- that goes by the desig- --</p> <p>21 designation "RPLRG"?</p> <p>22 A Wasn't that -- was -- gosh, I'm scratching</p> <p>23 my memory here. I thought that RPLRG -- give me a</p> <p>24 few seconds.</p> <p>25 Yeah, that was some -- you know, 2017. One</p>	<p style="text-align: right;">Page 164</p> <p>1 lodge an objection to this method and line of</p> <p>2 inquiry. I don't know about the authenticity of it,</p> <p>3 nor do I know that this witness is qualified --</p> <p>4 THE WITNESS: Well, this -- this one's</p> <p>5 authenticate. I can -- I -- I know that.</p> <p>6 MS. CLINE: Let me just finish my</p> <p>7 objection.</p> <p>8 I'm not sure this is an appropriate means</p> <p>9 of questioning a lay witness. To get this over with,</p> <p>10 I'll sit here while you do it, but we preserve our</p> <p>11 objections.</p> <p>12 MR. GREIM: Understood.</p> <p>13 Q (By Mr. Greim) Now I'm going to show you</p> <p>14 what we have previously produced to the parties and</p> <p>15 transcribed in English as Video 4.</p> <p>16 (Counsel plays Video 4 for the witness.)</p> <p>17 MR. GREIM: Okay. I've stopped it at the</p> <p>18 6:47 mark.</p> <p>19 Q (By Mr. Greim) So my first question to you</p> <p>20 is: Did -- did you recognize the two individuals who</p> <p>21 were on screen at the beginning of the clip?</p> <p>22 A Yes. The interview -- the interviewer is</p> <p>23 Mr. Xiaoping Chen. Last name C-h-e-n, first name</p> <p>24 Xiaoping, X-i-a-o-p-i-n-g, of Mirror Media.</p> <p>25 Q That's a name you mentioned earlier today?</p>

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<p>1 supporting Mr. Bannon.</p> <p>2 Q No, you -- you -- you became the be</p> <p>3 director in November of 2018; isn't that correct?</p> <p>4 A That's not true. At that time, the -- the</p> <p>5 foundation was not -- was not even -- was not -- did</p> <p>6 not exist. And I signed the documents -- I think</p> <p>7 it's in June or July 2019.</p> <p>8 Q Okay. So let's just get this on the record</p> <p>9 then. When -- when did you become a director of the</p> <p>10 Rule of Law -- Law Society?</p> <p>11 A I think it's May or June in 2000- --</p> <p>12 whenever they incorporate, you know, they sent me</p> <p>13 the -- those things. But the -- I think the --</p> <p>14 the -- the Society did not officially exist until the</p> <p>15 first board meeting, which was, I think -- let me</p> <p>16 see -- May 2019.</p> <p>17 Q So your testimony is that you didn't become</p> <p>18 a board member of the Rule of Law Society until May</p> <p>19 of this year?</p> <p>20 A That's my understanding.</p> <p>21 Q Okay. And then you resigned in September</p> <p>22 of this year?</p> <p>23 A Yes.</p> <p>24 Q And what happened between May and September</p> <p>25 that caused you to resign?</p>	<p>1 work with the Chinese Communist Party in whatever</p> <p>2 way, not related, that's -- that's bullshit.</p> <p>3 And, also, Mr. Guo making that much money</p> <p>4 with that much -- and so what I support? I support</p> <p>5 anyone who would rebel that system. And you see</p> <p>6 that -- look at Mr. Gorbachev and --</p> <p>7 Q I just need you --</p> <p>8 A -- look at all --</p> <p>9 Q I just need you to answer my questions.</p> <p>10 A Yes, I'm answering your question. You need</p> <p>11 to understand that. You need to understand we, as</p> <p>12 dissidents, support anyone who rebel against the</p> <p>13 Communist Party.</p> <p>14 Q Did Mr. Guo rebel against the Communist</p> <p>15 Party?</p> <p>16 A For a time, appears so.</p> <p>17 Q And what was that period of time?</p> <p>18 A Well, when he started his -- his expose' in</p> <p>19 2017 and -- well, no, 2017 he was still supporting</p> <p>20 Mr. Xi.</p> <p>21 But one thing we -- as a journalist, I'm</p> <p>22 extremely interested is that we know the Chinese</p> <p>23 government is corrupt. We know hundreds of billions</p> <p>24 of dollars was stolen from the Chinese people and</p> <p>25 Mr. Guo clearly was part of that. I so welcome for</p>
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<p>1 A I was -- first I was in Europe and --</p> <p>2 for -- and the second in -- in -- during that time I</p> <p>3 had a lot of exchange with Mr. Bannon, and I heard</p> <p>4 Mr. Guo claim so many times he -- you know, he -- he</p> <p>5 is in control of the -- this -- these entities. And</p> <p>6 I talk to Mr. Bannon and I feel very uncomfortable.</p> <p>7 The day I resign was the day I -- they sent</p> <p>8 me the financial statement and I realized whatever</p> <p>9 money they promised never exist.</p> <p>10 And so that's why I thought I would not</p> <p>11 become part of -- you know, I would not cheat the</p> <p>12 public. It's very simple. Just think of it. The</p> <p>13 day I got the -- I got the financial statement to see</p> <p>14 how much money is there, and I realized they have</p> <p>15 been lying to the public all the time, so I resign.</p> <p>16 Q Okay. But the source of your discomfort</p> <p>17 didn't have anything to do with the fact that you</p> <p>18 thought Mr. Guo was backed by the Chinese Communist</p> <p>19 Party, correct?</p> <p>20 A No. Because, you know, the ways that the</p> <p>21 Chinese Communist Party control, they stole the</p> <p>22 entire country. So someone who lived in China one</p> <p>23 way or another, you have to work with the Chinese</p> <p>24 Communist Party.</p> <p>25 I understand that whoever said they never</p>	<p>1 Mr. Guo to expose how the Chinese government saw it,</p> <p>2 even he is part of that --</p> <p>3 Q Ms. Gong --</p> <p>4 A Yeah.</p> <p>5 Q -- I just need you to answer my questions.</p> <p>6 A I am answering your question because that's</p> <p>7 not a yes or no question.</p> <p>8 Q Okay. So I thought you had testified</p> <p>9 earlier that from the day -- even before you met</p> <p>10 Mr. Guo, you thought he was backed by and supportive</p> <p>11 of the Chinese --</p> <p>12 A Yep.</p> <p>13 Q -- Communist Party.</p> <p>14 A But I think he might have rebelled.</p> <p>15 Q Okay. So just chronologic- --</p> <p>16 A I still think that -- chronol- --</p> <p>17 chronog- -- chronologically, 2016, I heard his name,</p> <p>18 and the rest is I knew he escape and he started to</p> <p>19 expose a lot of details of corruption in China.</p> <p>20 I -- of course, we welcome that. I think</p> <p>21 United States government should welcome that and it</p> <p>22 should question that.</p> <p>23 So, repeatedly, I question him. I offer</p> <p>24 him to sit down with him and write out all the</p> <p>25 details. He repeatedly denied me.</p>

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<p>1 Q Okay. I'm just trying to get the</p> <p>2 chronology. So when was the --</p> <p>3 A Yes.</p> <p>4 Q When was the first time you met Mr. Guo?</p> <p>5 A April 17th, 2017.</p> <p>6 Q Okay. And prior to that, I thought you</p> <p>7 said you believed that he was supportive of the CCP?</p> <p>8 A Oh, of course. And it's all in the media.</p> <p>9 Q Okay. And when did you come to think that</p> <p>10 he was rebelling against the CCP?</p> <p>11 A Well, after -- I think in -- in late 2017,</p> <p>12 after he -- actually, let me put it back.</p> <p>13 First, I was -- I was wondering, why would</p> <p>14 the Chinese -- you know, our -- our -- our interview,</p> <p>15 why would the Chinese government put so much</p> <p>16 objection to our interview?</p> <p>17 And so, you see, I interview a lot of</p> <p>18 people, top Chinese dissident. I say -- like, if you</p> <p>19 want example, the blind activist, Chen Guangcheng,</p> <p>20 when he was in Beijing, you know, I interviewed him</p> <p>21 on air. No problem.</p> <p>22 Q Ms. Gong, I just need to know when you</p> <p>23 first thought Mr. -- Mr. Guo was rebelling against</p> <p>24 the CCP.</p> <p>25 A For a while. And I think 2018, when he</p>	<p>1 A That's not that true because -- it's really</p> <p>2 simple. For people who can expose corruption, most</p> <p>3 of them are part of corruption.</p> <p>4 So you're making -- you're -- he's -- he</p> <p>5 was making claims against some people in the Chinese</p> <p>6 government. And I would love to know, even today,</p> <p>7 what are the details? How they stole money from</p> <p>8 Chin- -- from the Chinese people. That's why.</p> <p>9 I was making a claim that he -- he makes</p> <p>10 claim against certain individuals and he expose</p> <p>11 details of corruption. And those details we still</p> <p>12 don't know at this point.</p> <p>13 As I said, the Mr. Lui case, I said before,</p> <p>14 the (inaudible) case, remember that? How much money?</p> <p>15 It's because that was billions of dollars of</p> <p>16 real estate. How --</p> <p>17 Q So I just want to make sure I'm</p> <p>18 understanding.</p> <p>19 So at the time of your Wall Street Journal</p> <p>20 article in May of 2017, is it your view that Mr. Guo</p> <p>21 was a supporter of the Chinese government or was he</p> <p>22 rebelling against it?</p> <p>23 A My --</p> <p>24 MR. GREIM: Objection; asked and answered.</p> <p>25 THE WITNESS: Yeah. Okay. My reveal -- my</p>
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<p>1 started to say "I'm against CCP," and I don't</p> <p>2 remember which date.</p> <p>3 But, you know, all the time I thought he</p> <p>4 was -- he was also someone who deal with CCP because</p> <p>5 he talk about his old leaders and -- all the time and</p> <p>6 have been, you know, trying to put stuff on the</p> <p>7 record.</p> <p>8 Q So you wrote an article in the Wall Street</p> <p>9 Journal about the Voice of America interview,</p> <p>10 correct?</p> <p>11 A Yes.</p> <p>12 Q And you wrote -- that was published in May</p> <p>13 of 2017, correct?</p> <p>14 A Right.</p> <p>15 Q And at that point in time you characterized</p> <p>16 Mr. Guo as making claims about "extensive corruption</p> <p>17 in the Chinese Communist Party" --</p> <p>18 A Yes.</p> <p>19 Q -- is that correct?</p> <p>20 A That's true.</p> <p>21 Q Okay.</p> <p>22 A Otherwise, I won't interview him.</p> <p>23 Q Okay. So at -- at least in April and May</p> <p>24 of 2017, your view was that Mr. Guo was making claims</p> <p>25 against the Chinese Communist Party?</p>	<p>1 view is that he -- he supports the Chinese. He was</p> <p>2 part of the corruption, but now he wants to get his</p> <p>3 revenge. I don't know -- I was still doing my</p> <p>4 investiga- -- investigation at that time. I don't</p> <p>5 know his -- his personal view.</p> <p>6 Q (By Ms. Cline) Okay. But you reported that</p> <p>7 you were -- you were reporting on his claims of</p> <p>8 corruption in the CCP, correct?</p> <p>9 A Of course.</p> <p>10 Q And, in fact, in the -- in or around the --</p> <p>11 the time that the -- that the video -- sorry, that</p> <p>12 the interview was to take place, the Chinese</p> <p>13 government issued a warrant for Mr. Guo's</p> <p>14 arrest; isn't that true?</p> <p>15 A That was April 17, 2017, in the morning, I</p> <p>16 think.</p> <p>17 You know, that was very strange to me,</p> <p>18 because, you know, if you issue an arrest warrant to</p> <p>19 someone who's already abroad, how do you realize that</p> <p>20 arrest warrant? That, I -- well, the Chinese</p> <p>21 government rarely did things like that. They may</p> <p>22 claim. They may claim someone's a criminal,</p> <p>23 whatever.</p> <p>24 I have to be thinking of that. You know,</p> <p>25 all the Chinese -- that never happens, shenanigan,</p>

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<p>1 that -- calling Voice of America, threatening us, was</p> <p>2 to make the publicity, to give Guo credibility,</p> <p>3 because Mr. Guo had very little credibility before</p> <p>4 that. After that, he -- he gained credibility from</p> <p>5 my interview.</p> <p>6 Q Okay. I -- I just need you to answer my</p> <p>7 question.</p> <p>8 A Yes, that's an answer. It's a more</p> <p>9 complicated answer, yes.</p> <p>10 Q Okay. You report -- you -- you -- you try</p> <p>11 to be truthful and accurate in your reporting,</p> <p>12 correct?</p> <p>13 A Very much.</p> <p>14 Q Right. And in your Wall Street Journal --</p> <p>15 Journal article, you reported that on April 17th the</p> <p>16 Chinese government issued an arrest warrant for</p> <p>17 Mr. Guo.</p> <p>18 A Yes, I did.</p> <p>19 Q And that's a -- that was a true statement,</p> <p>20 right?</p> <p>21 A That's a true statement. And I also have</p> <p>22 secondhand sources.</p> <p>23 Q Okay.</p> <p>24 A Second or third sources for that.</p> <p>25 Q And you believe that the reason the Chinese</p>	<p>1 corruption, but -- well, he want to expose. I'm not</p> <p>2 sure if he's against the corruption, otherwise, you</p> <p>3 know, when somebody brag about so much money having,</p> <p>4 so he's part of the corruption.</p> <p>5 Q (By Ms. Cline) And you resigned from the</p> <p>6 Rule of Law Society in September of this year,</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q And isn't it true that Mr. Guo suggested</p> <p>10 that you should resign?</p> <p>11 A Yeah. He also suggest -- I was also</p> <p>12 thinking -- I actually stand -- talk to Mr. Bannon</p> <p>13 before Mr. Guo make any suggestions. And Guo</p> <p>14 actually make the claim he kicked me out of the --</p> <p>15 the -- the Board.</p> <p>16 Q Well, Mr. Guo kicked you out of the Board</p> <p>17 because --</p> <p>18 A That's what he said.</p> <p>19 Q -- or he asked you to resign because he was</p> <p>20 upset about some of the -- the traveling and the</p> <p>21 reporting you were doing overseas, correct?</p> <p>22 A I didn't do any report traveling.</p> <p>23 Q What were you doing in the Ukraine and --</p> <p>24 A I did not go to Ukraine at all.</p> <p>25 Q Okay. Did you go to Russia?</p>
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<p>1 government issued for -- a warrant for Mr. Guo's</p> <p>2 arrest was that he was speaking out against members</p> <p>3 of the Communist Party, correct?</p> <p>4 A Yes, he's --</p> <p>5 MR. GREIM: Objection.</p> <p>6 THE WITNESS: -- speaking out the details</p> <p>7 of corruption, which is very important.</p> <p>8 Sorry for the objection --</p> <p>9 MR. GREIM: That's okay.</p> <p>10 THE WITNESS: -- but I -- you know, the</p> <p>11 detail -- the corruption, Jesus Christ, and the</p> <p>12 human -- human history never saw that sort of</p> <p>13 corruption in our history from the Chinese</p> <p>14 government.</p> <p>15 Q (By Ms. Cline) And Mr. Guo was speaking out</p> <p>16 against that corruption?</p> <p>17 A Against the members and the -- the -- so</p> <p>18 that's why I grill him so much in the -- I -- I</p> <p>19 believe. And he is part of the corruption. And we</p> <p>20 welcome for anyone who's part of the corruption to</p> <p>21 expose the corruption.</p> <p>22 Q So is he part of the corruption or is he</p> <p>23 against the corruption?</p> <p>24 MR. GREIM: Objection; asked and answered.</p> <p>25 THE WITNESS: No, he's -- he's part of the</p>	<p>1 A No, not at all. I need a visa. I did want</p> <p>2 to go because, you know, I want to interview</p> <p>3 Mr. Gorbachev, and the -- Russia would deny any</p> <p>4 journalistic visa that --</p> <p>5 Q Okay. I mis- -- misremembered your</p> <p>6 testimony.</p> <p>7 Did you testify earlier that you did some</p> <p>8 traveling overseas for the purposes of making a</p> <p>9 journalistic movie?</p> <p>10 A Yes.</p> <p>11 Q Okay. Where did you go?</p> <p>12 A Well, Austria. And from Austria, because</p> <p>13 we carry orders, and -- and to -- to Czech Republic,</p> <p>14 Slovakia, Poland, Lithuania and Hungary.</p> <p>15 Q Okay.</p> <p>16 A And Bannon -- Mr. Bannon asked me to stop</p> <p>17 by Italy. I did for two days. That's it.</p> <p>18 Q Okay. And when you were in those</p> <p>19 countries, did you interview people for purposes of</p> <p>20 your movie?</p> <p>21 A Oh, yes.</p> <p>22 Q Okay. And part of the reason Mr. Guo asked</p> <p>23 you to resign was because he was -- he was in</p> <p>24 disagreement with the things you were doing with</p> <p>25 those interviews?</p>

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<p style="text-align: right;">Page 213</p> <p>1 time.</p> <p>2 Dissident are people who defend freedom,</p> <p>3 who are freedom fighters. Dissident's where we --</p> <p>4 I -- personally, I don't include people who, you</p> <p>5 know, try to say when you took the money and they try</p> <p>6 to get the money back, you are accused, and then you</p> <p>7 claim you're dissident. You're not. That's not my</p> <p>8 community.</p> <p>9 My community, we -- we risk everything to</p> <p>10 fight -- to fight against communism. We risk</p> <p>11 everything from young -- very young age. We're --</p> <p>12 people risk lives. So many people got executed,</p> <p>13 killed, jailed. We suffered.</p> <p>14 Q (By Ms. Cline) So you would consider</p> <p>15 yourself a dissident?</p> <p>16 A Absolutely.</p> <p>17 Q What -- how about Mr. Lianchao Han, is he a</p> <p>18 dissident?</p> <p>19 A Yes.</p> <p>20 Q And how about Mr. Guo, is he a dissident?</p> <p>21 A No.</p> <p>22 Q And why do you say that?</p> <p>23 A Because he never resisted communism when he</p> <p>24 live under communism.</p> <p>25 Q Was he -- was he ever a dissident?</p>	<p style="text-align: right;">Page 215</p> <p>1 dissident hunter?</p> <p>2 A No. He -- he said he was a friend of</p> <p>3 dissident hunter. I don't know if he's a dissident</p> <p>4 hunter. Maybe he is, maybe he's not, but he's so</p> <p>5 close to so many dissident hunters.</p> <p>6 Q But -- but not so close that it didn't stop</p> <p>7 you from being his friend, right?</p> <p>8 A Well, as I said, yes. When whoever --</p> <p>9 whoever have the intention to expose CCP, yes.</p> <p>10 And I'll -- as I said, I feel sorry for</p> <p>11 him. I was his friend because I'm friend of lots of</p> <p>12 people who left China, who felt so alo- -- you know,</p> <p>13 who -- just being persecuted, family being arrested.</p> <p>14 Even they, well, corrupted themselves because, as I</p> <p>15 said, we have to be -- well, we have to have</p> <p>16 compassion.</p> <p>17 Q Do you --</p> <p>18 A That's my compassion.</p> <p>19 Q Do you have any firsthand personal</p> <p>20 knowledge -- not what you read in the -- not what you</p> <p>21 talked to -- interviewed somebody about, not what</p> <p>22 you've read online.</p> <p>23 Do you have any firsthand knowledge about</p> <p>24 whether or not Mr. Guo resisted communism?</p> <p>25 A I don't have any personal knowledge of him</p>
<p style="text-align: right;">Page 214</p> <p>1 A No.</p> <p>2 Q And when you say, "He never resisted</p> <p>3 communism," how do you know?</p> <p>4 A Because he work -- no dissident work -- work</p> <p>5 know, because he work -- no dissident work -- work</p> <p>6 that closely with the head of Chinese espionage, with</p> <p>7 the -- with dissident persecutors like Mr. John Greer</p> <p>8 (phonetic).</p> <p>9 Think of it. If I'm a dissident, how do I</p> <p>10 work closely with the one who hunt us, who</p> <p>11 interrogate? How do I -- do I be a friend? How do I</p> <p>12 even get close?</p> <p>13 Like, in your case, would you -- would you,</p> <p>14 like, hate that person's guts? So I can't be a</p> <p>15 friend. If you're friend with that corrupt group,</p> <p>16 with the persecutors, with the killers, you're not.</p> <p>17 Q So if you're a friend with -- of someone</p> <p>18 who supports the CCP, then you can't be a dissident?</p> <p>19 A Not support CCP. No. No. No. Millions</p> <p>20 of people support CCP, but who are part of the</p> <p>21 persecutors, who are dissident hunters, who</p> <p>22 persecute, who are commissars in jail, who control</p> <p>23 the legal system to persecute dissidents. You</p> <p>24 cannot.</p> <p>25 Q So is -- in your view, is Mr. Guo a</p>	<p style="text-align: right;">Page 216</p> <p>1 resisting communism under communism. And he -- and,</p> <p>2 now, whatever he claim -- when you -- anyone in the</p> <p>3 United States, a free country, can claim they resist</p> <p>4 communism, but a dissident is -- is someone who</p> <p>5 resist communism under communism, who risk</p> <p>6 everything.</p> <p>7 Q Do you have any firsthand knowledge that</p> <p>8 Mr. Guo supported communism?</p> <p>9 A Yes.</p> <p>10 Q What --</p> <p>11 A Mr. Guo told me that, because he said he</p> <p>12 was -- he partic- -- I have -- I have record here --</p> <p>13 he participate in high-ranking communist government's</p> <p>14 meetings, and he even describe, not only to me, but</p> <p>15 also to other journalists present.</p> <p>16 He said he was part of the decision-making</p> <p>17 group of the CCP, and they had meetings in</p> <p>18 Zhongnanhai.</p> <p>19 Q What -- when did he tell you that?</p> <p>20 A 2018.</p> <p>21 Q And where -- where -- where was that</p> <p>22 conversation?</p> <p>23 A In his apartment with the chief editor of</p> <p>24 Harvard Business Review and a few other -- with a few</p> <p>25 other journalists.</p>

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1 CERTIFICATE	1 ERRATA SHEET
2	2 Witness Name: SASHA GONG
3 STATE OF OKLAHOMA)	3 Case Name: EASTERN PROFIT CORPORATION LIMITED v.
4) SS:	4 STRATEGIC VISION US, LLC
5 COUNTY OF OKLAHOMA)	5 Date Taken: NOVEMBER 26, 2019
6	6 Page # _____ Line # _____
7 I, Jana C. Hazelbaker, Certified Shorthand	7 Should read: _____
8 Reporter within and for the State of Oklahoma, do	8 Reason for change: _____
9 hereby certify that SASHA GONG, was by me first duly	9
10 sworn to testify the truth, the whole truth, and	10 Page # _____ Line # _____
11 nothing but the truth, in the case aforesaid; that	11 Should read: _____
12 the above and foregoing videotaped deposition was by	12 Reason for change: _____
13 me taken in shorthand and thereafter transcribed;	13
14 that the same was taken on NOVEMBER 26, 2019, in	14 Page # _____ Line # _____
15 WASHINGTON, DC; that I am not an attorney for nor	15 Should read: _____
16 relative of any of said parties or otherwise	16 Reason for change: _____
17 interested in the event of said action.	17
18 IN WITNESS WHEREOF, I have hereunto set my	18 Page # _____ Line # _____
19 hand and official seal this 9th day of December,	19 Should read: _____
20 2019.	20 Reason for change: _____
21	21
22 _____	22 Page # _____ Line # _____
23 Jana C. Hazelbaker, CSR	23 Should read: _____
24 State of Oklahoma CSR No. 1506	24 Reason for change: _____
25	25 Witness Signature: _____
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1 ALARIS LITIGATION SERVICES	1 STATE OF _____)
2	2
3 December 11, 2019	3 COUNTY OF _____)
4	4
5 EDWARD D GREIM	5 I, SASHA GONG, do hereby certify:
6 GRAVES, GARRETT, LLC	6 That I have read the foregoing deposition;
7 1100 MAIN STREET	7 That I have made such changes in form
8 SUITE 2700	8 and/or substance to the within deposition as might
9 KANSAS CITY, MO 64105	9 be necessary to render the same true and correct;
10 IN RE: EASTERN PROFIT CORPORATION LIMITED v.	10 That having made such changes thereon, I
11 STRATEGIC VISION US, LLC	11 hereby subscribe my name to the deposition.
12	12 I declare under penalty of perjury that the
13 Dear EDWARD D GREIM:	13 foregoing is true and correct.
14 Please find enclosed your copies of the deposition of	14 Executed this _____ day of _____,
15 SASHA GONG taken on November 26, 2019 in the	15 20____, at _____.
16 above-referenced case. Also enclosed is the original	16
17 signature page and errata sheets.	17
18 Please have the witness read your copy of the	18
19 transcript, indicate any changes and/or corrections	19 _____
20 desired on the errata sheets, and sign the signature	20 SASHA GONG
21 page before a notary public.	21
22 Please return the errata sheets and notarized	22
23 signature page within 30 days to our office at 1608	23 NOTARY PUBLIC
24 Locust Street, Kansas City, MO 64108 for filing.	24 My Commission Expires:
25	25
1 Sincerely,	
2	
3 Jana C. Hazelbaker	
4	
5 Enclosures	

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